IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

LEE COFFEY Plaintiff. **V.** **SUSSEX COUNTY COMMUNITY COLLEGE, JON CONNOLLY, KEVIN SHAW, SALVATORE PAOLUCCI, TOWN OF NEWTON, STEVEN VAN NIEUWLAND, STEVEN SIEK, ERIC SOROKA, JUDY TORRES, JOHN DOE OFFICERS 1-5, JEROME NEIDHARDT, THOMAS MILITANO, SUSSEX COUNTY BOARD OF COUNTY COMMISSIONERS, DOUGLAS STEINHARDT AND 1-10 OTHER UNNAMED DEFENDANTS,** Defendant(s).	)	**Case No. 2:25-cv-01264**

FIRST AMENDED COMPLAINT FOR VIOLATION OF CIVIL RIGHTS

INTRODUCTION

1. This civil rights action, brought pursuant to 42 U.S.C. § 1983 and 18 U.S.C. § 1962 (Racketeer Influenced and Corrupt Organizations Act, "RICO"), seeks relief for violations committed under the Supreme Authority of the United States Constitution, specifically the First Amendment (freedom of speech and right to petition the government for redress), Fourth Amendment (protection from unlawful seizure and arrest), Sixth Amendment (right to a fair

trial), and Fourteenth Amendment (rights to due process and equal protection). Plaintiff also asserts federal claims of significant malicious abuse of process under 42 U.S.C. § 1983. Further, Plaintiff advances supplemental state-law claims pursuant to the New Jersey Civil Rights Act ("NJCRA"), N.J.S.A. 10:6-1 et seq., and the common-law tort of Intentional Infliction of Emotional Distress ("IIED").

2. Plaintiff, Lee Coffey, a former international student at Sussex County Community College ("SCCC"), brings this action against the Defendants, including municipal entities, state officials, and individual actors, for deliberate and unlawful violations of his civil rights under 42 U.S.C. § 1983; for engaging in a coordinated conspiracy to deprive Plaintiff of constitutional protections; for retaliatory actions designed to silence and punish him for constitutionally protected speech and whistleblowing activities; and for malicious abuse of legal process. Through their conduct, the Defendants have inflicted upon Plaintiff not only severe emotional and psychological harm but also devastating financial loss, irreparable harm to his reputation, resulting in life-threatening consequences through deliberate indifference. These acts constitute a systemic betrayal of the fundamental safeguards enshrined in both the United States Constitution and New Jersey state law—protections intended to defend vulnerable individuals from abuse, corruption, and official misconduct. Defendants' intentional and concerted efforts have undermined public trust in law enforcement, governmental institutions, and the judiciary, striking at the very core of democratic principles and the rule of law.

3. Plaintiff seeks compensatory and punitive damages to redress the profound injuries suffered as a direct and proximate result of Defendants' unlawful conduct, including violations of his constitutional rights and statutory protections. Plaintiff further requests declaratory and injunctive relief to prevent ongoing and future violations and to safeguard against further abuse of governmental authority. Additionally, Plaintiff seeks recovery of

attorney's fees, costs, and all other expenses incurred in pursuing this action, pursuant to 42 U.S.C. § 1983, treble damages under the Racketeer Influenced and Corrupt Organizations Act ("RICO"), 18 U.S.C. § 1962, and all other applicable federal and state statutes, including, but not limited to, the New Jersey Civil Rights Act (NJCRA). This request encompasses all remedies available under law to ensure full and just redress for the egregious harm inflicted by the Defendants and to uphold the integrity of the constitutional and statutory safeguards designed to protect individuals from retaliation, corruption, and abuse of power.

JURISDICTION AND VENUE

4. This Court has original jurisdiction over the subject matter of this action pursuant to 28 U.S.C. §§ 1331 and 1343, as this case arises under the Constitution and laws of the United States, including but not limited to 42 U.S.C. § 1983, which provides a civil remedy for violations of constitutional rights by persons acting under color of state law; 18 U.S.C. §§ 1961 et seq. (Racketeer Influenced and Corrupt Organizations Act, or "RICO"), which authorizes private civil actions against those who conduct or participate in an enterprise engaged in a pattern of racketeering activity; and other applicable federal statutes. This Court also has supplemental jurisdiction over Plaintiff's related state law claims pursuant to 28 U.S.C. § 1367(a), as these claims arise out of the same nucleus of operative facts and form part of the same case or controversy under Article III of the United States Constitution.

5. This action arises under federal law, raising substantial federal questions regarding violations of the First, Fourth, Sixth, and Fourteenth Amendments to the United States Constitution, which guarantee fundamental rights including freedom of speech and petition, protection against unlawful seizure and arrest, the right to a fair trial, and due process and equal protection under the law. Jurisdiction is further supported by the Declaratory Judgment Act, 28

U.S.C. §§ 2201 and 2202, which authorizes this Court to declare the rights and legal relations of the parties and to provide further necessary relief. Plaintiff brings claims pursuant to 42 U.S.C. §§ 1983 and 1988, establishing remedies and attorney's fees for civil rights violations, as well as 28 U.S.C. § 1920 regarding taxable costs. Complementing these federal claims, Plaintiff asserts state-law claims under the New Jersey Civil Rights Act ("NJCRA"), N.J.S.A. 10:6-1 et seq., which protects against violations of civil rights under state law. Additionally, Plaintiff brings tort claims for Intentional Infliction of Emotional Distress ("IIED"), reflecting the extreme and outrageous conduct inflicted by Defendants. Collectively, these claims arise from a unified nucleus of operative facts and seek comprehensive redress for Defendants' unlawful actions.

6. This Court has authority to grant the requested injunctive relief under 28 U.S.C. § 1343(3), the requested declaratory relief pursuant to 28 U.S.C. §§ 2201 and 2202, and Plaintiff's prayer for costs, under 42 U.S.C. § 1988 and 28 U.S.C. § 1920.

7. Venue is proper in this District pursuant to 28 U.S.C. § 1391(b) because the events giving rise to this action occurred within the District of New Jersey.

PARTIES

8. Plaintiff Lee Coffey is a former international student at Sussex County Community College (SCCC) and a resident of Sussex County, New Jersey.

9. Defendant Sussex County Community College (SCCC) is a public community college located in Newton, New Jersey, and is an entity subject to suit under 42 U.S.C. § 1983, 18 U.S.C. § 1962. SCCC is sued in its official capacity, as this action challenges policies, customs, and practices attributable to the institution itself.

10. Defendant Jon Connolly is the former President of SCCC, and acted under color of state law during the events giving rise to this action. Connolly is sued in his individual capacity under 42 U.S.C. § 1983, 18 U.S.C. § 1962, for his direct participation in unlawful conduct against Plaintiff, including, but not limited to, retaliation, academic sabotage, conspiracy, threats to kill and possession of a firearm (for Plaintiff) on college grounds.

11. Defendant Kevin Shaw is a SCCC affiliated housing provider for SCCC students and acted under color of state law during the events giving rise to this action. Shaw is sued in his individual capacity under 42 U.S.C. § 1983, 18 U.S.C. § 1962, for his direct participation in unlawful conduct against Plaintiff, including, but not limited to, acting in concert with SCCC and Jon Connolly to systematically abuse Plaintiff, racketeering, obstruction of justice, exploitation, intimidation, threats, violence, retaliation and blackmail directly against Plaintiff.

12. Defendant Salvatore Paolucci is a professor of business and economics at SCCC, and acted under color of state law during the events giving rise to this action. Paolucci is sued in his individual capacity under 42 U.S.C. § 1983, 18 U.S.C. § 1962, for his direct participation in unlawful conduct against Plaintiff, including, but not limited to, academic sabotage, academic retaliation, conspiracy and breach of fiduciary duty owed to Plaintiff.

13. Defendant Town of Newton is a municipal entity located in Sussex County, New Jersey, and is subject to suit under applicable state and federal law, including 42 U.S.C. § 1983, 18 U.S.C. § 1962, for its institutional role in creating, enforcing, and ratifying unconstitutional policies, customs, and practices that foreseeably and directly resulted in the deprivation of Plaintiff's rights. The Town of Newton is sued in its official capacity, as this action challenges long-standing and systemic failures, including but not limited to, deliberate indifference to police misconduct, failure to supervise or discipline law enforcement officers engaged in retaliatory enforcement, active concealment of material exculpatory evidence, selective enforcement against

Plaintiff based on protected conduct, and direct coordination with other institutional Defendant(s) to obstruct justice and retaliate against Plaintiff for asserting his legal rights. The conduct at issue was not incidental or unauthorized, but constituted formal or de facto municipal policy carried out under color of state law in violation of clearly established constitutional protections.

14. Defendant Steven VanNieuwland is the former Chief of the Newton Police Department and acted under color of state law during the events giving rise to this action. VanNieuwland is sued in his individual under 42 U.S.C. § 1983, 18 U.S.C. § 1962, and official capacities for his direct and supervisory role in enabling constitutional violations that endangered Plaintiff's life, including, but not limited to, failure to protect, creation of a custom of deliberate indifference, engaging in conspiracy, selective enforcement, retaliatory policing and a breach of fiduciary duty owed to Plaintiff.

15. Defendant Steven Siek is a police officer employed by the Newton Police Department and acted under color of state law during the events giving rise to this action. Siek is sued in his individual capacity under 42 U.S.C. § 1983, 18 U.S.C. § 1962, for his direct participation in unconstitutional conduct against Plaintiff, including, but not limited to, retaliatory policing, deliberate indifference, violation of due process, abuse of power and conspiracy to obstruct justice.

16. Defendant Eric Soroka is a police officer employed by the Newton Police Department and acted under color of state law during the events giving rise to this action. Soroka is sued in his individual capacity under 42 U.S.C. § 1983, 18 U.S.C. § 1962, for his direct participation in unlawful conduct against Plaintiff, including, but not limited to, conspiracy to amplify charges based on a personal conflict of interest, violation of due process, retaliatory policing, deliberate indifference and abuse of power.

17. Defendant Judy Torres is a Detective Sergeant employed by the Newton Police Department and acted under color of state law during the events giving rise to this action. Torres is sued in her individual capacity under 42 U.S.C. § 1983, 18 U.S.C. § 1962, for her direct participation in unlawful conduct against Plaintiff, including, but not limited to, deliberate indifference, failure to protect, selective enforcement, conspiracy and dereliction of fiduciary duty.

18. Defendant(s) John Doe Officers 1-5 are law enforcement officers employed by the Newton Police Department and New Jersey State Police, and are subject to suit under 42 U.S.C. § 1983, 18 U.S.C. § 1962. Defendant(s) John Doe Officers 1-5 are sued in their individual capacities for their direct participation in unconstitutional conduct against Plaintiff, including, but not limited to, retaliatory policing, deliberate indifference and conspiracy to obstruct justice.

19. Defendant Jerome Neidhardt is an individual employed by the Sussex County Prosecutor's Office and is subject to suit under applicable state and federal law, including 42 U.S.C. § 1983, 18 U.S.C. § 1962, for his direct role in enabling and participating in constitutional violations that endangered Plaintiff's rights. Neidhardt is sued in his individual capacity, as this action challenges conduct taken under color of state law, including but not limited to, administrative decisions uncorrelated to the exercise of courtroom advocacy, malicious prosecution, conspiracy, deliberate indifference, obstruction of justice, deprivation of due process, selective enforcement, and coordination with other Defendant(s) to retaliate against Plaintiff. Neidhardt's conduct was almost exclusively undertaken outside the scope of any protected prosecutorial function and is not shielded by immunity

20. Defendant Thomas Militano is an individual employed by the New Jersey Office of the Public Defender and was assigned to represent Plaintiff through the Sussex County Office of the Public Defender, located at 20 E Clinton St, Newton, NJ 07860. Militano is subject to suit

under applicable state and federal laws, including 42 U.S.C. § 1983, 18 U.S.C. § 1962, for his direct role in enabling constitutional violations that endangered Plaintiff's rights, including but not limited to, failure to provide effective assistance of counsel, conspiracy, deliberate indifference, legal malpractice, obstruction of justice, and a breach of fiduciary duty owed to Plaintiff as a client. Militano acted under color of state law and in concert with other Defendant(s), including law enforcement and prosecutorial actors, to sabotage Plaintiff's defense and suppress exculpatory evidence. Militano's conduct was undertaken outside the scope of protected legal advocacy and is not shielded by immunity.

21. Defendant Sussex County Board of County Commissioners (SCBCC) is the governing body of Sussex County, New Jersey, and is subject to suit under 42 U.S.C. § 1983, 18 U.S.C. § 1962. SCBCC is sued in its official capacity, as this action challenges policies, customs, and practices attributable to the institution itself, including, but not limited to, deliberate indifference to mass public inquiries, including Plaintiffs own complaint against named Defendant(s), failure to protect, conspiracy, and a severe breach of fiduciary duty owed to Plaintiff as a resident of Sussex County.

22. Defendant Senator Douglas Steinhardt, Presidential Nominee for the position of U.S Attorney General for New Jersey, and Counsel of Record for Defendant Sussex County Board of County Commissioners ("SCBCC"), is sued in his individual capacity pursuant to 42 U.S.C. § 1983 and 18 U.S.C. § 1962 for his direct, knowing, and active participation in constitutional violations that significantly endangered Plaintiff's civil rights. As Sussex County's Chief Counsel, Steinhardt exercises de jure control over the county's governing agencies and instrumentalities, orchestrating and endorsing the malicious prosecution of Plaintiff in retaliation for his whistleblowing and protected speech. Steinhardt's misconduct encompasses his deliberate ratification, imposition and enforcement of a fraudulent settlement agreement, in response to a

civil lawsuit between Sussex County Community College ("SCCC") and Plaintiff, which was strategically ratified in a SCCC Executive Session and filed with the Superior Court "dismissed without costs". The settlement procured through coercion and material misrepresentations successfully extinguished Plaintiff's valid criminal defenses and case theories under the auspices of "Res Judicata and Collateral Estoppel" wherein critical evidence related to Plaintiff's criminal defense was barred, thus securing a criminal conviction. In the wake of Plaintiff's federally protected civil rights filings with this Honorable Court on February 13, 2025, Steinhardt orchestrated and escalated a renewed campaign of retaliation by filing meritless and desperate criminal complaints with multiple enforcement agencies at the local, state, and federal levels, in addition further to establishing communications with the U.S. State Department to ensure Plaintiff's deportation and "inability to re-enter the United States". These orchestrated actions were calculated to intimidate Plaintiff, suppress his constitutionally protected speech, and wrongfully subject him to incarceration. Such conduct, from a political heavyweight, constitutes a brazen effort to chill Plaintiff's exercise of fundamental rights through a sustained pattern of official harassment, vindictive prosecution, and abuse of prosecutorial power.

23. Other unnamed defendants 1–10, whose identities are presently unknown but who are responsible for the unconstitutional acts described herein, are individuals subject to suit under 42 U.S.C. § 1983 and 18 U.S.C. § 1962. These defendants are sued in their individual capacities for their direct participation in unconstitutional conduct against Plaintiff.

FACTUAL ALLEGATIONS

24. Plaintiff Lee Coffey is a former international student at Sussex County Community College (SCCC), located at One College Hill Rd, Newton, NJ, 07860, and a resident of Sussex County, New Jersey. He was recruited to the institution under authorization of the U.S.

Department of Homeland Security (DHS) F-1 visa program, primarily to participate in SCCC's nationally ranked soccer program and to simultaneously pursue educational opportunities.

25. Upon arrival in the United States, Plaintiff, along with another 20 international students, was placed into a housing arrangement orchestrated by SCCC and overseen by Jon Connolly through housing provider Kevin Shaw. This arrangement, situated at 96 High St, Newton, NJ, 07860, was presented to Plaintiff and others as a secure housing option but was in fact unregulated, exploitative, overcrowded, and failed to meet adequate safety and living standards.

26. The student group situated at Kevin Shaw's property comprised of the following individuals: Lee Coffey, Alex Davis, Darcy O'Connor, Adam Moosa, Sebastian Stephan, Enrico Tarquinio, Jasper Cramp, Anton Tomm, Keiran Ouellette, Alessandro Filetti, Rickson Hill, Julian Cardona, Sean Morgan, Charlie Austin Ross, Sofia Anica, Carina Gasparini, Lara O'Toole, Susa Kreitz, Sophie Taylor, Asha McClurg, and Paula Herold.

27. Through this housing arrangement, SCCC generated $240,240[1] per year in tuition payments, while Kevin Shaw generated $110,000[2] per year in rental contributions

28. Over the course of the following six months, Kevin Shaw, Jon Connolly, and Sussex County Community College (SCCC) engaged in a coordinated racketeering blackmail scheme, profiting from the coerced participation of vulnerable international students recruited from overseas through a pattern of abuse, extortion, retaliation, fraud, money laundering, labor trafficking, and obstruction of justice. Connolly, Shaw, and other SCCC administrators used threats of visa revocation, academic sabotage, and police intervention to force students into compliance, compelling them to make undocumented cash rental payments under an illegal housing racket operated by Shaw, which was designed to evade taxes and launder illicit proceeds through various companies. Kevin Shaw further deployed hidden cameras inside his property

without the students knowledge, in an effort to collect compromising material for use in blackmail.

29. When Plaintiff sought to expose and report the unlawful housing scheme to college officials and local authorities, he became the target of a coordinated campaign of retaliation. Jon Connolly, acting under color of law, conspired to deprive Plaintiff of his constitutional rights by fabricating the revocation of his F-1 student visa. As a result of this decision, Plaintiff's legal status in the United States became unlawful.

30. Kevin Shaw, acting under color of law and in violation of New Jersey landlord-tenant law, acted in concert with SCCC administration and Jon Connolly to unlawfully evict Plaintiff from student housing without a court order. Shaw further coerced other international students to deny Plaintiff entry into the residence by threatening them with deportation, eviction, and arrest, specifically, by leveraging his relationship with SCCC, Jon Connolly, and the Newton Police Department to instill fear, compliance and order.

31. Kevin Shaw's eviction letter was delivered to Plaintiff via email on January 10, 2021, while Plaintiff was out of State in Florida. The eviction letter ordered Plaintiff to 'quit and deliver up possession of the premises to Kevin Shaw' on January 11, 2021. Among the reasons cited in the letter for eviction were 'failure to complete designated chores' and 'disrespect towards owner.'

32. On January 11, 2021, Plaintiff ended his trip in Florida and arrived at Newark Liberty International Airport (EWR), and then proceeded to travel to Kevin Shaw's property located at 96 High St, Newton NJ, in order to retrieve personal possessions that were left at the property.

33. Kevin Shaw refused entry and threatened to call the police if Plaintiff 'stepped on his property.' Shaw also gave instructions to tenants Alex Davis, Darcy O'Connor, Keiran

Ouellette, Julian Cardona and Alessandro Filetti to refuse entry to Plaintiff or else they would 'also be evicted' and that he would contact 'the administration [college] to have them removed [from SCCC].' Plaintiff was unable to secure personal items such as banking cards, clothing and other pertinent materials to find immediate emergency accommodation.

34. Plaintiff placed calls to SCCC officials including DSO (Designated School Official) Erin Casne, Head Soccer Coach Frank Vernacchio who both failed to connect Plaintiff's call.

35. Temperatures in Newton NJ, ranged from 27° - 31° Fahrenheit with heavy snow. Plaintiff, arriving from Florida without adequate winter clothing, took refuge in Provident Bank located at 15 Trinity St, Newton, NJ 07860 after experiencing symptoms of hypothermia.

36. Plaintiff walked to Holiday Inn Express & Suites, located at 8 N Park Dr, Newton, NJ, 07860, and explained to hotel staff of his situation. Staff allowed Plaintiff to stay for the night conditional upon Plaintiff paying invoice within 24 hours.

37. Kevin Shaw now sought to retain Plaintiff's prepaid rental contributions and security deposit, valued in excess of $4,000, which Plaintiff had paid upfront for the year at the recommendation of SCCC officials.

38. Plaintiff proceeded to stay at Holiday Inn Express & Suites, located at 8 N Park Dr, Newton, NJ 07860, while continuing his education and business degree at the institution. Plaintiff's decision was reported to be at the 'dismay' of Jon Connolly and Kevin Shaw who saw Plaintiff as a 'threat' to the college housing arrangement

39. Weeks later, Plaintiff was removed from SCCC's nationally ranked soccer program without consultation, prior notice or due process, in an act of retaliation intended to limit Plaintiff's athletic opportunities and to force Plaintiff's self-removal from both the institution and United States.

40. Head Soccer Coach Frank Vernacchio, who recruited Plaintiff to SCCC after 2 years of correspondence, informed Plaintiff that he 'was no longer sure if [Plaintiff] should be part of the [soccer] program anymore' and that Plaintiff should 'return home' as '[Plaintiff's] actions have caused issues between the team and the landlord [Kevin Shaw].'

41. Plaintiff opted to resolve matters by stating he was 'incredibly determined to remedy and make things better' and that his 'interactions with Kevin Shaw have been in good faith and always with full respect.'

42. Plaintiff decided to continue with his education at SCCC.

43. However weeks later, Plaintiff's Business Management professor, Salvatore Paolucci, acting in conspiracy with Jon Connolly, falsely accused Plaintiff of academic plagiarism during a midterm exam. As a result, Plaintiff was sanctioned, reprimanded, and publicly humiliated, causing irreparable harm to his academic standing, credibility, and reputation. This retaliatory action led to a damaged GPA, loss of faith in the institution, and significant reputational harm intended to undermine Plaintiff's viability to continue at the institution.

44. Soon after these events, Salvatore Paolucci was awarded tenure from SCCC, becoming the first professor to receive tenure under the presidency of Jon Connolly in over 8 years.

45. SCCC required Plaintiff to enroll in winter classes to 'restore his GPA' and, through its officials, encouraged him to leave the United States under the pretense that doing so would 'allow him to obtain a new I-20 certificate of eligibility' that would 'restore his F-1 student status' and allow Plaintiff to 'regain eligibility' for the soccer program.

46. Plaintiff successfully restored his academic standing and, with formal confirmation from SCCC officials, including Designated School Official (DSO) Erin Casne, who

was authorized by the U.S. government to handle immigration matters, departed the United States in accordance with the guidance provided.

47. Weeks later, when Plaintiff attempted to re-enter the United States through Newark Liberty International Airport, he was detained and questioned by federal authorities. During the interrogation, authorities informed Plaintiff that his newly issued I-20, provided by SCCC, was fraudulent and that the college did not authorize his return under the F-1 visa program.

48. Federal authorities further stated that SCCC, through its DSO Erin Casne, had failed to update the Student and Exchange Visitor Information System (SEVIS), thereby preventing Plaintiff's lawful re-entry into the United States.

49. Plaintiff was detained by federal authorities for approximately seven hours while officials attempted to verify his student status by contacting the college DSO. After multiple unsuccessful attempts to reach the DSO, Plaintiff was eventually granted temporary entry into the United States and directed to report to SCCC for the issuance of a new I-20 form.

50. Plaintiff returned to SCCC, updated his I-20, secured permanent housing at 91 Trinity St, Newton, NJ, and resumed his education and participation in the soccer program. Plaintiff also changed degree programs and maintained athletic eligibility at the request of Head Soccer Coach, Frank Vernacchio.

51. Over the following nine months, Plaintiff was subjected to continued retaliation by SCCC officials, including systematic targeting by SCCC campus security, which involved deliberate stops, searches, and intrusive questioning; this treatment was proven to have been made at the request of Jon Connolly.

52. During this period, Plaintiff also received numerous requests and phone calls from SCCC international students who still resided at Kevin Shaw's property, asking Plaintiff to

provide sanctuary from Shaw's continued abuses.

53. Plaintiff became increasingly alarmed by the escalating nature of the calls, which now involved urgent reports of student suicide attempts, self-harm, drug overdoses, violent conduct, and 'severe psychological trauma', claimed by multiple international students residing at Kevin Shaw's property.

54. Plaintiff, having demonstrated proficiency in law and mastery over the English language, was elected to serve as the representative for several international students who were victimized by Kevin Shaw and neglected by SCCC.

55. These students raised claims of ongoing racial, physical, and emotional abuse, financial coercion, as well as allegations of discrimination and retaliatory actions by SCCC officials, mirroring the retaliation experienced by Plaintiff.

56. Plaintiff began documenting student concerns, conducting official due diligence, and continued to investigate the legality of the housing arrangements, including applicable laws, ordinances, and regulations in the State of New Jersey.

57. Plaintiff initiated contact with SCCC officials overseeing the operation, including Head Soccer Coach Frank Vernacchio and DSO Erin Casne who had significant personal knowledge of the facts.

58. Upon establishing contact, Plaintiff was instructed by SCCC officials to refrain from asking 'too many questions' regarding the international student housing operation, as it was said to have 'the potential to ruin the soccer program.' Additionally, Plaintiff was subjected to attempted blackmail by SCCC officials, who placed the responsibility of any collapse of the program on Plaintiff.

59. Weeks later, Plaintiff, acting as a known liaison between SCCC and the international student body, was contacted by Sean Morgan, an African American student residing

at Kevin Shaw's property. Morgan provided Plaintiff with a recording of a phone call with Shaw from the previous day. The recording, made in response to Morgan's failure to pay rent, captures Shaw making overtly racist and derogatory remarks, including stating that Morgan 'can't pay rent but can go get chicken.' Shaw further threatened to have Morgan 'escorted out of his property tomorrow' so he could 'find a ride back to Maryland', showing additional disregard for New Jersey Landlord Tenant Law.

60. Plaintiff and Morgan presented the audio recordings directly to SCCC officials to report Kevin Shaw's alarming statements and racist conduct. Upon reviewing the recordings, SCCC officials appeared visibly concerned and assured Plaintiff and Morgan that they would 'pass this to the right people.'

61. Upon learning of Plaintiff's activities, Jon Connolly instructed SCCC security to 'give them [Plaintiff] hell.' While SCCC actively obstructed any investigation into the complaints raised by Plaintiff and Morgan. The suppression of evidence and further retaliation was an attempt to mitigate institutional liability, and to further ensure the future profitability of the international student housing arrangement that was now becoming a lucrative racket for SCCC and Kevin Shaw.

62. During this time, Jon Connolly dismissed several security personnel who refused to engage in the systematic retaliation against Plaintiff and employed additional security personnel more favourable to his 'authoritarian' approach.

63. Jon Connolly began forming his own private security force on college campus grounds in attempts to both target and harass non-compliant individuals including Plaintiff. It was claimed by SCCC officials that around this time Jon Connolly began to develop a 'personal vendetta' against Plaintiff.

64. Jon Connolly terminated the employment of DSO Erin Casne after she refused his

request to cancel Plaintiff's visa. Casne also expressed concerns to SCCC administrators regarding the 'high volume of international students enrolling at SCCC' and the 'unavailability of secure housing.'

65. Jon Connolly's decision resulted in the U.S Government Department of Homeland Security Designated School Official (DSO) position at the college vacant and without a trained successor, further disrupting the administration and oversight of international student operations.

66. Jon Connolly subsequently appointed Jamie Borger, a SCCC softball coach, to the DSO position despite a 'lack of requisite training or experience' as acknowledged by Borger.

67. Around this time, international student Alex Davies, was physically assaulted by Kevin Shaw due to a verbal argument occurring from Davies' absent rent payment. Davies claimed Shaw 'squared up to him after losing his temper' and 'pushed him [Davies] into oncoming traffic' outside of the student residence. Davies' reported this assault to the Newton Police Department, and immediately moved away from Shaw's property. However, NPD and assigned officer Steven Siek did not launch any investigation towards Shaw's actions.

68. SCCC now without any trained federal oversight, added an additional 16 new international students to the soccer program.

69. The newly arrived students were, once more, accommodated at Kevin Shaw's property, located at 96 High St, Newton, NJ 07860, in addition to a large quantity of returning students from the previous year.

70. This second year group of students, housed at Kevin Shaw's property was significantly larger and comprised of the following individuals, Jay-Leigh Amour, Santiago Vasquez, Diogo Ferreira, Kane Fisher, Adrian Hernandez Rodriquez, Cody Cooper, Ethan Streeter, Tiago Marques, Joao Campos, Yannick Ossinonde, Matthew Goldfinch, Adam Moosa,

Jasper Cramp, Keiran Ouellette, Julian Cardona, Sean Morgan, Charlie Austin Ross, Anna Peck, Lisa Kirwan, Lotte Klüter, Madison Gunderman, Sofia Anica, Carina Gasparini, Lara O'Toole, Susa Kreitz, Sophie Taylor, Asha McClurg, Paula Herold and Regan Thiel, bringing the total parties housed by Shaw to 27.

71. Through this new housing arrangement, SCCC generated an additional $324,234[3] per year in total tuition payments, while Kevin Shaw generated an additional $148,500[4] per year in rental contributions.

72. It was also discovered during this time that Head Soccer Coach Frank Vernacchio was receiving substantial compensation for his recruitment of international students, similar to SCCC's 'under the table deal' with another SCCC professor, Dr. Ludmilla Mecaj, who received a 30% commission for her recruitment of foreign international students from Albania.

73. Kevin Shaw, now housing 27 students, began converting all available spaces within the building into bedrooms. These included dining areas, closet spaces, and attic corners and bathrooms. To maximize the use of these areas, Shaw erected wall dividers and set up inexpensive partitions, not in line with any building regulations, in an attempt to maximize his profits from SCCC students.

74. During this time, numerous recorded complaints were made by international students to SCCC officials, including directly to Jon Connolly, but no official action was taken by the college against Kevin Shaw.

75. Around this time, Plaintiff was contacted by Orlando Rodriquez, a local attorney representing Santiago Vasquez, a Colombian international student and soccer player housed at Shaw's property. It was reported that Vasquez had been physically assaulted by Shaw 'a few days prior' and pressed charges in the Newton Municipal Court.

76. Several days later, Plaintiff escalated concerns to SCCC administration after a

second year international student, Adrian Rodriquez, now missing from campus and student housing, left a suicide note stating that Kevin Shaw was 'hunting him' and expressed remorse for 'what he was about to do [suicide].' In his note Rodriquez also blamed SCCC for 'not listening to him' and remarked that 'this is not why he came to America.'

77. Defendants SCCC, Jon Connolly, and Kevin Shaw immediately conspired to conceal the situation, collaboratively fabricating a narrative that Adrian Rodriquez was 'simply homesick' and 'disgruntled with the lack of field minutes' in relation to the soccer program. This was done in an effort to mitigate liability and in attempts to contain the situation away from the public. Rodriquez was later located by SCCC officials and 'ordered' to return to his home country.

78. Around this time, voluminous calls were placed to the Newton Police Department regarding Kevin Shaw's abusive and illegal conduct. Officer Steven Siek, now assigned as case manager, received numerous calls from the international students describing their abuse. However no investigation was ever launched by Siek.

79. Plaintiff was now perceived as the sole systemic threat to the viability of the international housing arrangement due to his questions, and was subjected to a continued pattern of retaliatory actions by SCCC officials. Connolly further ordered that security personnel were to be deliberately stationed outside Plaintiff's classes, gym sessions, and study areas, where they were recommended to conduct intrusive searches and interrogations 'in full view' of classmates and faculty in order to 'shame Plaintiff.' These actions resulted in Plaintiff being publicly stigmatized and wrongfully associated with 'criminal conduct' and he began developing a reputation for 'trouble'

80. Weeks later, Plaintiff, representing 21 international students and with the support of Head Soccer Coach Frank Vernacchio, drafted a formal complaint to be submitted to

the SCCC Board of Trustees, addressing the hostile conditions of student housing and Plaintiff's ongoing systemic targeting by SCCC security.

81. Jon Connolly became aware of Plaintiff's intentions and promptly responded by terminating the role of Head Soccer Coach Frank Vernacchio. This decision significantly destabilized the soccer program and Plaintiff was considered by many to have been 'responsible' for its collapse. This decision also allowed SCCC to distance the institution away from Kevin Shaw's actions which were now coming under increasing scrutiny from within the college.

82. In coordination with these actions, Kevin Shaw immediately expelled all remaining students from his property, and without the students' knowledge or consent, removed their personal belongings from bedrooms, placed them in black bags, and discarded them on the SCCC campus while the students were out of State.

83. Due to the fallout of this decision, the following 20 individuals left the institution, Jay-Leigh Amour, Kane Fisher, Cody Cooper, Adrian Rodriguez, Ethan Streeter, Tiago Marques, Joao Campos, Yannick Ossinonde, Matthew Goldfinch, Adam Moosa, Jasper Cramp, Keiran Ouellette, Julian Cardona, Sean Morgan, Charlie Austin Ross, Sofia Anica, Carina Gasparini, Lara O'Toole, Susa Kreitz, Asha McClurg, Paula Herold and Regan Thiel.

84. The returning individuals comprised of Plaintiff, Santiago Vasquez, Diogo Ferreira, Anna Peck, Lisa Kirwan, Lotte Klüter, Madison Gunderman and Sophie Taylor.

85. Returning students Santiago Vasquez and Diogo Ferreira were able to find alternative housing at 161 Mill St, Newton, NJ, 07860, and resumed studies at SCCC.

86. Returning students Anna Peck, Lisa Kirwan, Lotte Klüter, Madison Gunderman and Sophie Taylor were able to find alternative housing at 6 Clinton St, Newton, NJ, 07860, and resumed studies at SCCC.

87. Plaintiff returned to his residence at 91 Trinity St, Newton, NJ, 07860, and opted

to finish his degree at SCCC after contributing close to $20,000 towards his education.

88. Around this time, Plaintiff became the subject of ongoing excessive stalking and harassment by Kevin Shaw, who believed he had been 'cheated out of a substantial revenue stream' due to Plaintiff's complaints.

89. During this period, SCCC officials reported that Jon Connolly expressed significant frustration toward Plaintiff, describing him as 'trash that needs to be taken out.' Connolly's behavior was characterized by faculty as 'increasingly erratic and neurotic', particularly in response to Plaintiff's 'continued presence at the college.' These observations were documented and shared among staff, highlighting Connolly's hostile attitude toward Plaintiff and his efforts to undermine Plaintiff's standing at the institution.

90. On May 16, 2022, Plaintiff became the father of a child with a Sussex County resident.

91. With new financial, social, and ethical obligations arising from his status as the parent of a U.S. citizen, Plaintiff requested a work-authorization permit through SCCC's Designated School Official (DSO), Jamie Borger.

92. Jamie Borger refused to issue Plaintiff a work-authorization permit, citing her 'lack of training' and the fact that she was 'wearing too many hats' in her roles at SCCC. However, Borger advised Plaintiff to schedule an appointment on a future date, which Plaintiff agreed to.

93. As Plaintiff approached the SCCC administration building for his scheduled appointment with DSO Jamie Borger, Kevin Shaw, who had been lying in wait, abruptly exited a parking bay on campus and confronted Plaintiff while inside a vehicle. Shaw attempted to provoke Plaintiff by revving his engine and threatening to call the police, stating that he would have 'him [Plaintiff] arrested.' In a further attempt to incite a reaction, Shaw made sarcastic

remarks regarding Plaintiff's newborn child. Plaintiff removed himself from the situation and subsequently reported the incident to both DSO Jamie Borger and SCCC campus security; however, 'no probable cause' was found to warrant an official report against Shaw.

94. Over the following months, Kevin Shaw repeatedly drove past Plaintiff's residence and intercepted Plaintiff as he walked to SCCC. On three separate occasions, Shaw confronted Plaintiff while he was en route to classes. Plaintiff believed Shaw was intent on causing him harm and feared that Shaw might eventually use a firearm against him in a 'drive by shooting.' Plaintiff attempted to report Shaw's conduct to the Newton Police Department and directly to officer Steven Siek, but no probable cause was established, and no report was filed. It was later revealed that Jon Connolly had been providing Shaw with information regarding Plaintiff's class schedule.

95. However during this time, Plaintiff would receive numerous calls from Newton Police Department officials requesting that Plaintiff 'come in [to the station] for an interview.' It was later revealed that Plaintiff was the subject of a 'fraud investigation' due to a frivolous complaint by Kevin Shaw.

96. Kevin Shaw would return to Newton Police Barracks on more than two occasions to claim that Plaintiff was 'attempting to extort him [Shaw] for monies', and made reference to his status as a 'taxpayer' and 'member of the community', subsequently pressuring the NPD to investigate and charge Plaintiff with criminal offenses.

97. On or about June 1, 2022, Sussex County Sheriff Michael Strada formally recommended that the County Superintendent of Schools, Gayle Carrick, seek emergency funding from the State of New Jersey to deploy armed security personnel within all county educational institutions, including Sussex County Community College ("SCCC"), citing heightened concerns for student safety in the aftermath of the mass shooting in Uvalde, Texas,

which resulted in more than twenty fatalities.

98. On June 8, 2022, during a public meeting of the Sussex County Board of County Commissioners, Commissioner Chris Carney stated that while student safety must remain the paramount concern of all county officials, the Commissioner's Office lacked sufficient personnel to assign law enforcement officers to each school as a deterrent against active shooter incidents.

99. Commissioner Chris Carney further asserted on the record that, "If anyone walks into a school with a gun, they should not walk out of that school."

100. In the fall of 2022, Plaintiff enrolled in an Exercise Science course at SCCC, with Professor Nicholas Lionetti.

101. Two weeks into the course, Miles Shaw, the son of Kevin Shaw, was placed into Plaintiff's class after Jon Connolly leaked Plaintiff's class schedule directly to Shaw.

102. On September 14, 2022, Kevin Shaw waited outside the SCCC campus for Plaintiff to finish his classes. Plaintiff spotted Shaw and attempted to avoid confrontation by taking an alternate route and hiding in another campus building. When Shaw did not leave, Plaintiff proceeded to leave the building and change paths. Shaw then reversed, revved his engine, pulled his vehicle close to the curb, and stated that Plaintiff was 'on borrowed time.' Shaw made further erratic gestures implying he possessed a firearm and stated, 'I got something for you,' while searching his glove box. Plaintiff repeatedly instructed Shaw to leave him alone and recorded the confrontation. Upon realizing he was being recorded, Shaw departed the scene.

103. Plaintiff presented evidence of Shaw's harassment to SCCC security personnel, resulting in the filing of a campus security report. A report was also filed with the Newton Police Department by Garrett Armstrong who informed Plaintiff that he could write a Municipal Court Complaint, however Plaintiff avoided filing this report 'in fear of something else could happen.'

104. Following this incident, Plaintiff ceased attending all physical classes at SCCC.

105. Shortly thereafter, Plaintiff informed DSO Jamie Borger that he no longer felt safe on campus and expressed his desire to transition to 'online only classes.' Plaintiff requested that SCCC approved Plaintiff's work authorization so he could support his child.

106. Jamie Borger later informed Plaintiff that there were 'no online classes available' and that all 'classes were full.' Upon Plaintiff contacting the class professors directly the professors stated that 'we always have availability.'

107. Plaintiff's GPA subsequently fell below the minimum threshold required to maintain F-1 student visa privileges, prompting SCCC to immediately terminate his student visa.

108. Plaintiff, now convinced that he had been wrongfully denied the chance to obtain a fair and equitable education at SCCC, declared his intention to initiate legal proceedings against both SCCC and Kevin Shaw.

109. On October 19, 2022, Plaintiff formally declared his intent to initiate legal proceedings against Sussex County Community College by electronically serving Glenn Keinz, SCCC Counsel Of Weiner Law Group LLP. Plaintiff also delivered a physical summons to Wendy Fullem [as process server] at the SCCC administration building.

110. On October 28, 2022, Plaintiff received a response from Stephen J. Edelstein, a member of the firm at Weiner Law Group LLP. Edelstein asserted that Plaintiff's claims were an attempt to defame Kevin Shaw 'without a shred of evidence' and described Shaw as a 'long standing member of Newton's professional community.' Edelstein concluded the letter by accusing Plaintiff of attempting to 'unlawfully extort money from the college through vague threats of public embarrassment' and stated that further communication would be 'unnecessary' if Plaintiff 'continued on this course.'

111. On November 14, 2022, Plaintiff formally declared his intent to initiate legal proceedings against Kevin Shaw by electronically serving Shaw and physically delivering a summons to Shaw's business address [as process server] at Newton Health and Wellness located at 94 High St, Newton, NJ, 07860.

112. On November 22, 2022, Sussex County Community College enacted Resolution No. RO11222022-2, formally appointing Porzio, Bromberg & Newman as General Counsel. Furthermore, the college authorized the retention of three sets of Special Counsel through Resolution No. RO11222022-3 (Florio, Perrucci, Steinhardt, Cappelli, Tipton, & Taylor), Resolution No. RO11222022-4 (Weiner Law Group), and Resolution No. RO11222022-5 (Laddy, Clark, and Ryan, with Janet C. Lucas serving as Counsel). These extensive appointments were undertaken in anticipation of the legal proceedings initiated by Plaintiff, demonstrating the college's concerted efforts to strengthen its legal representation in response to Plaintiff's claims, which now posed institutional risk.

113. During this period, effective from June 23, 2021, Douglas J. Steinhardt of the firm Florio, Perrucci, Steinhardt, Cappelli, Tipton, & Taylor was also acting as the Sussex County Board of County Commissioners Counsel, with his firm providing a 'professional services agreement' contract to support Sussex County.

114. On December 19, 2022, Plaintiff was employed as a professional soccer coach.

115. On January 23, 2023, an altercation occurred between Plaintiff and Kevin Shaw. The incident took place when Plaintiff, operating as a process server, delivered pertinent legal documents to Shaw. After delivering the summons, Shaw physically confronted Plaintiff and blocked his exit from the property and stepped towards Plaintiff with concealed hands. Shaw made contact with Plaintiff's nose and trampled on his feet while backing him towards a

doorway. In self-defense, Plaintiff struck Shaw once and left the scene upon being pursued by a third-party in his blind-spot.

116. Following the altercation on January 23, 2023, the Newton Police Department, led by Officer Steven Siek and with Officer Eric Soroka as support, responded to the incident involving Plaintiff and Kevin Shaw. Despite obtaining video evidence from the scene suggesting that Plaintiff acted in self-defense after being physically confronted by Shaw, the department's handling of the case raised significant concerns. Rather than thoroughly investigating the circumstances, including Shaw's aggressive conduct, the department appeared to focus disproportionately on Plaintiff's actions.

117. Police body-worn camera footage revealed alarming details about the incident, including a conspiracy between Officer Steven Siek, Officer Eric Soroka and Sergeant Michael Wolanski who later responded to the scene.

118. Despite an 'on-scene protocol briefing' by Sergeant Michael Wolanski, who informed Steven Siek and Eric Soroka on NPD's assault protocol, specifically with regards to a single strike application of defense. The footage showcases Siek and Sorka participating in a conspiracy to elevate the charges against Plaintiff from a 'disorderly persons offense' to an 'aggravated assault felony.'

119. Upon locating the video surveillance footage, Steven Siek, Eric Soroka and Michael Wolanski watch a copy of the altercation taken from a security camera on Shaw's property.

120. The footage shows Kevin Shaw attempting, through physical menace, to place Plaintiff in fear of serious injury [simple assault], prompting Plaintiff's single act of

self-defense and his fleeing of the property.

121. Sergeant Wolanski reaffirms to Eric Soroka that Plaintiff needs to 'admit to it [assault]' as 'it [the assault] was done out of our presence', and that Plaintiff cannot be 'arrested' [based upon the footage alone]. Wolanski then departs the scene.

122. Eric Soroka walks back inside the property and initiates a conversation with Steven Siek by saying 'so what are you feeling man, cause I know that you were kinda the supervisor over the past few years and you were letting the kids [international students] take calls, what are you thinking, with what you want to do?' Siek responds with 'I find I would talk to the guy… cuff me, after watching the video it's cut and dry.'

123. Steven Siek further comments, 'it's weird cause [Sergeant Michael] Wolanski is the only one in this department with the thought process of agg [aggravated] assault and simple assault in this department.'

124. It is later heard that Steven Siek and Eric Soroka begin to manufacture claims that Plaintiff could be a 'mixed martial arts fighter' or 'professional boxer' and that they could 'escalate the charge' [simple assault] to an 'aggravated assault' if they get Plaintiff to admit he has 'some kind of formal training.'

125. Upon closing the investigation, Kevin Shaw's wife, Ati Shaw appears to ask Steven Siek and Eric Soroka a follow up question by stating 'what are our rights about this physical assault'; Soroka responds with 'so that's exactly what it is, it's called simple assault.'

126. Soroka further informs Ati Shaw that 'in the State of New Jersey this is considered a disorderly persons offense right now' and there is a 'sort of criteria we have to prove in order to charge him.' Soroka further comments 'we need to find him first, we need

to talk to him, [and] if he admits to it, we can charge him with a simple assault.'

127. Before Eric Soroka leaves, Ati Shaw is heard saying 'We have known you [Soroka] and your family since a little boy' and that she was 'so glad to see him [Soroka] arrive' and further commented that you [Soroka] and her son [Noah Shaw] 'used to be childhood friends.'

128. On January 24, 2023. Plaintiff is contacted by Steven Siek requesting an interview at the Newton Police Barracks, located on 39 Trinity St, Newton, NJ 07860.

129. Plaintiff arrives on his own recognizance and is escorted for a police interview with Steven Siek and Eric Soroka.

130. Plaintiff is informed by Steven Siek that he is being detained and is under arrest for third-degree aggravated assault.

131. Plaintiff is escorted to an interview room and invokes his Miranda Rights and requests an attorney present as he is 'not familiar with the United States laws and rules.'

132. Plaintiff is processed, fingerprinted and photographed.

133. Plaintiff is given a ticket summons for third-degree aggravated assault and is released on his own recognizance.

134. Following his aggravated assault charge, Plaintiff faced a series of municipal and criminal charges in a targeted campaign of harassment from local law enforcement. Plaintiff would receive 30 municipal court summons, including criminal complaints of 'harassment' signed by Jon Connolly and a 'defiant trespassing charge' for returning to SCCC campus issued by Newton Police Department. These tickets all occurred

within a 14 month period and were designed to demoralize and silence Plaintiff's lawsuit against SCCC and Kevin Shaw.

135. On February 2, 2023, Plaintiff received a letter from SCCC counsel Stephen J. Edelstein titled 'EXPULSION', informing Plaintiff that he was 'immediately dismissed from any student status he may still have' that was 'limited in part to his assault on Dr. Shaw and his resulting arrest.' Edelstein further commented 'the college will promptly notify the immigration authorities that he [Plaintiff] has been expelled' and that Plaintiff was 'not welcome to reapply.' Edelstein ended the letter by stating he is 'copying this letter to Chief Steven Van Nieuwland so he can be made aware of these circumstances.'

136. On February 14, 2023, Plaintiff, pro-se, filed a Special Civil Part claim against Sussex County Community College in the Sussex Vicinage Superior Court.

137. On February 22, 2023, upon Plaintiff delivering pertinent litigant materials to the Sussex County Community College administration building, he was apprehended by Officer Anthony Keiling of the Newton Police Department and frivolously charged with 'CRIMINAL TRESPASS-DEFIANT TRESPASS-ACTUAL COMMUNICATION.'

138. SCCC officials reported that Jon Connolly exhibited 'extreme paranoia' following Plaintiff's lawsuit against the institution, allegedly believing that his 'image as college president was being ruined'. During this time, Connolly was also claimed to have begun carrying an unregistered personal firearm 'for Lee Coffey [Plaintiff]'; and was claimed by SCCC officials to have often 'fantasized about killing Plaintiff.'

139. On March 23, 2023, Jon Connolly, in an attempt to have Plaintiff incarcerated, leveraged his standing and connections within the town and filed a frivolous civil criminal

complaint against Plaintiff for 'annoying emails.' Connolly's verbal comments were enough to establish probable cause against Plaintiff and he was criminally charged by the State of New Jersey with 'HARASSMENT-COMMUNICATION IN A MANNER TO CAUSE ALARM.'

140. During this time Plaintiff was beginning to fall upon significant financial hardship due to significant reputational damage in the community and the increasing voluminous amount of court appearances he was required to attend. Plaintiff was in violation of immigration and was now required to pay mandatory child-support obligations valued at $500 per month under the threat of a bench warrant.

141. Plaintiff found employment to comply with new mandatory child-support obligations and increasing court costs.

142. On April 2, 2023, Plaintiff was contacted by 'Muna Kahali <admin@sussexcountycommunitycollege.com>', who claimed to be a 'SCCC insider' and 'website administrator' for the website 'www.sussexcountycommunitycollege.com.' It was claimed that Kahali was 'sympathetic to Plaintiff's treatment' and wanted to give Plaintiff a 'public platform' to share his grievances against the college.

143. The website in question 'www.sussexcountycommunitycollege.com' was considered by Plaintiff to be a 'whistleblower website' that operated as a 'protected space' for 'members of the public' to 'allow free speech in the Town of Newton.' The website often featured articles pertaining to the Sussex County Community College, and by extension, the Sussex County Board of County Commissioners. The website often claimed legal, ethical and federal violations against administrators in Sussex County.

144. On April 6, 2023, Plaintiff supplied a press-packet to 'Muna Kahali' pertaining

to the SCCC international student arrangement and his retaliatory treatment by the Newton Police Department.

145. On April 15, 2023, Plaintiff received an email from 'Muna Kahali <admin@sussexcountycommunitycollege.com>' stating 'We have received a significant threat in our mailbox that has been reasonably deducted as targeting you; other parties that have previously sent us evidence have also been sent this notice. It is advised you contact the Newton Police Department, or your local department immediately.'

146. 'Muna Kahali' then forwarded Plaintiff an email that was received with the subject 'DEAD IN THE WATER' with the following text 'You're dead in the water. Everyone thinks you're a psychopath and a fool. Say hello to the April Sea Information Technology company from me. I know them well. They will take you down. They're not your friends. Be aware of who you do business with for nefarious activities. Say hello to Sean and Lee.'

147. Plaintiff immediately reported this incident and supplied all pertinent information to Sergeant Detective Judy Torres of the Newton Police Department. Plaintiff also stated to Torres that 'given the nature of this case and the hostilities and action I have already faced from Kevin Shaw & Jon Connolly, I am perceiving the threat of dead in the water to be literal. I will need to visit the Police Station. Please note I also filed a complaint to Lake Hopatcong Police, earlier last month, after I was being aggressively followed by an unknown vehicle, for multiple days, close to my residence. I also managed to record this vehicle via Drone numerous times.'

148. The Newton Police Department failed to conduct any investigation into Plaintiff's concerns.

149. On April 17, 2023, Plaintiff, now believing he was being actively ignored by

the local authorities, contacted Cyber Investigative Services, a private detective agency, in an attempt to trace the 'DEAD IN THE WATER' email he received.

150. On April 23, 2023, Plaintiff's vehicle was towed while parked. This incident occurred when Plaintiff was targeted by New Jersey State Police while facilitating a drop-off with his child at the Andover State Police Barracks. Plaintiff's vehicle, which was not turned on and Plaintiff was not in, was towed and impounded by K&A Towing & Recovery upon Plaintiff waiting with his child in his arms and for his co-parent to arrive, Plaintiff was later issued 11 ticket summons with a mandatory court appearance.

151. New Jersey State Trooper Kerrison failed to give Plaintiff a copy of the 11 ticket summons due to a 'ticket machine malfunction' and claimed that the tickets would be 'mailed to Plaintiff.' This delay resulted in Plaintiff facing significant difficulties in regaining access to his primary vehicle for child visitation and work obligations, especially given pertinent release documents were in the impounded vehicle.

152. Plaintiff was not provided a copy of the 11 ticket summons and no mail was ever sent by New Jersey State Police to his address.

153. Plaintiff placed approximately 20 calls to Andover State Police Barracks from April 23, 2023 to May 17, 2023 to regain access to his vehicle but was unsuccessful.

154. Upon correspondence with Andover Municipal Court Prosecutor Alicia Ferrante, Plaintiff was informed that 6 of his 11 tickets had no legal basis and were duplicates [errors].

155. Plaintiff lost his employment as a professional soccer coach.

156. Plaintiff was further barred from seeing his child given the stigma of a serious

violent felony charge and repeated interactions with law enforcement. Plaintiff has not been permitted to see his child alone since April 23, 2023 and he has since lost full custody of his child.

157. Plaintiff purchased another vehicle.

158. On June 23, 2023, Plaintiff's civil action against Sussex County Community College was dismissed without prejudice for Plaintiff's failure to respond to Stephen Edelstein's voluminous [65+] interrogatories.

159. On June 26, 2023, Plaintiff made contact with Sussex County Board of County Commissioners Chris Carney, Herbert Yardley, Dawn Fantasia, Jill Space and William Hayden. Plaintiff stated 'I [Plaintiff] am writing to formally request that you [The Commission] investigate allegations of racketeering, fraud, and abuse at Sussex County Community College that encompass president Jon Connolly.' Plaintiff further stated that 'I am willing to supply testimony and evidence to the County Commissioners in order to support these claims and determine probable cause.'

160. On the same day, Commissioner Chris Carney responded with 'Mr. Coffey. Feel free at anytime to come to one of our commissioner meetings. Schedules are on the county website. Thanks.'

161. Later in the day, Plaintiff arrived at Newton Police Barracks to park his vehicle. Plaintiff walked over to the Sussex County Board of County Commissioners meeting located at 1 Spring St, Newton, NJ, 07860 in anticipation he could bring his concerns to the Commissioners. However, Plaintiff did not give any comments due to the time constraint on the public session.

162. Upon leaving the Sussex County Board of County Commissioners meeting and

walking back to his vehicle. Plaintiff was followed by a Newton Patrol Vehicle from 1 Spring St, Newton, NJ, 07860 to his vehicle parked at Newton Police Barracks.

163. As Plaintiff arrived at his vehicle, the driver door was open, low beam headlights were turned on and the engine was running. Plaintiff did not leave his vehicle in this condition and was concerned that someone had broken into his vehicle.

164. Plaintiff believed he was unable to contact the police, as he believed this crime would not be taken seriously and that he would suffer further police retaliation.

165. Plaintiff recalled that approximately 2 months prior, a man was reported to have had 'a self-inflicted gunshot wound to the head' in Plaintiff's same location.

166. Upon Plaintiff leaving Newton Police Barracks he was pursued by a vehicle.

167. Officer Anthony Keiling, the officer that previously charged Plaintiff with 'criminal trespass' gave pursuit to Plaintiff and followed him closely for approximately 30 seconds before signaling to pull over.

168. During this time, Plaintiff made a recorded call to his parents in England stating 'they are going to kill me.'

169. Anthony Keiling asked for Plaintiffs documentation which was missing from Plaintiff's glove box.

170. Keiling stated that Plaintiff would have to have his car towed if he couldn't produce the required documentation.

171. Plaintiff stated 'he knew what this was, in relation to his retaliation for attending

the County Commissioner meeting' and asked Keiling if he could 'email over the paperwork.'

172. Keiling issued a ticket summons for 'FAIL POSS DRIV LIC' and left the scene.

173. On June 29, 2023, Plaintiff informed the Sussex County Commissioners of his intention to contact the Commissioners attorney Douglas J. Steinhardt 'in preparation for litigation'; a decision Plaintiff stated was 'essential in the pursuit of justice and accountability.'

174. On June 30, 2023, Chris Carney informed Plaintiff of the escalation to Commissioner Attorney Douglas J. Steinhardt.

175. On July 10, 2023, Plaintiff issued a Municipal Court complaint against Wendy Fullem for a 'blatant disregard to Plaintiff's OPRA requests' made to SCCC.

176. On July 6, 2023, Plaintiff was contacted by New Jersey Staff Sergeant 'David Thomas <David.Thomas@njsp.gov>' with digital copies of the '11 ticket summons' that were issued against Plaintiff 74 days prior. Upon review, the incident dates, timings and vehicle registration information were inaccurate. However, by the time Plaintiff received these tickets, the vehicle had already been disposed of and Plaintiff was ordered to pay $693 in fines from the Frankford Joint/Blairstown Shared Municipal Court.

177. On July 10, 2023, Plaintiff received an update from Cyber Investigative Services. It was revealed that SCCC official Kathleen Peterson 'with a reasonable degree of technical certainty' was likely to have sent the 'DEAD IN THE WATER' threat to Plaintiff based upon internet protocol (I.P) tracing to Petereson's home in Glenwood, New Jersey.

178. Kathleen Peterson, who acted in concert with Jon Connolly to suppress the international student housing arrangement, was considered by SCCC officials as

being 'Connolly's loyalist.'

179. On the same day, Plaintiff filed a Municipal Court Complaint against Kathleen Peterson and supplied a copy of the Cyber Investigative Service report as probable cause. Plaintiff alleged a criminal breach of N.J.S.A. 2C:33-4a - Makes, or causes to be made, a communication or communications anonymously or at extremely inconvenient hours, or in offensively coarse language, or any other manner likely to cause annoyance or alarm.

180. On the same day, Plaintiff re-filed his Municipal Court complaint against Wendy Fullem, after she 'continued to willfully ignore his voluminous OPRA requests made to the college.' Plaintiff alleged a breach of N.J.S.A. 47:1A-11, by stating 'a public official, officer, employee or custodian who knowingly and willfully violates OPRA and is found to have unreasonably denied access under the totality of the circumstances, shall be subject to a civil penalty.'

181. On July 12, 2023, Municipal Court administrator Katherine Quinn informed Plaintiff that 'Judge Carlucci determined no probable cause for both complaints due to [Civil] Superior Court Civil Litigation pending.'

182. Plaintiff responded with 'it is widely established in the United States and the State of New Jersey that the pendency of a civil matter does not, in itself, preclude the initiation or prosecution of a criminal offense.'

183. On July 18, 2023, Plaintiff refilled his complaint against Kathleen Peterson and Wendy Fullem in the Newton Municipal Court with additional evidence. Plaintiff further commented that 'the prior Municipal Court decision calls into question the impropriety of the Municipal Court… particularly given that Jon Connolly managed to establish probable cause, for

the same crime alleged against Peterson, with zero evidence.'

184. On the same day, Plaintiff established contact with Douglas J. Steinhardt, wherein Plaintiff informed him that 'if you [The Sussex County Commissioners] wish to prevent a federal lawsuit against the County Commissioners, the following must be answered: What is the status of the Commission's investigation towards Sussex County Community College? If this has not been initiated, please describe the reasoning behind this decision.'

185. On July 19, 2023, Stephen J. Edelstein proposed a resolution to Plaintiff for the return of his paid tuition payments to the institution valued at $18,893.00.

186. On July 20, 2023, Douglas J. Steinhardt responded to Plaintiff by saying 'Mr Coffey, In light of your communications with Attorney Edelstein, on which I am copied, I am holding firm. Resolution of your matter with the college will, by its nature, resolve your inquiry here. For that reason, I am standing by until that negotiation ends, one way or the other.'

187. Plaintiff, believing Steinhardt's ending comments 'one way or the other' was an implicit threat, agreed to Edelstein's tuition reimbursement proposal.

188. Stephen J. Edelstein drafted the settlement.

189. On July 21, 2023, Municipal Court administrator Katherine Quinn informed Plaintiff that the decision from Judge Carlucci was 'denied per prior decision.'

190. On July 25, 2023, the Sussex County Community College Board of Trustees 'approved agreement and release, and website transfer agreement between SCCC and a former student [Plaintiff] in the amount of $18,893.00.'

191. Several hours thereafter, a calculated fraud upon the court was perpetrated in the Sussex Vicinage Special Civil Part, when Stephen J. Edelstein, acting as Counsel for Sussex County Community College, unilaterally filed a "Stipulation of Dismissal with Prejudice and Without Costs." This submission materially misrepresented the true nature and terms of the underlying settlement, willfully obfuscating the fact that Plaintiff had received an $18,893.00 tuition refund as consideration.

192. Edelstein's filing was executed without Plaintiff's knowledge or consent or meaningful participation and was designed to preclude any record of Plaintiff's substantive recovery and the circumstances surrounding the settlement, in addition to including clauses detrimental to Plaintiff's future claims. Such conduct not only deprived Plaintiff of an accurate judicial record, but also laid the groundwork for proximal Defendants' subsequent eventual invocation of "res judicata and collateral estoppel" as a "poison pill" and "insurance policy" to infect Plaintiff's parallel criminal action.

193. This strategic and egregious abuse of process, undertaken with intent to deceive both the court and opposing party, constitutes a fraud upon the tribunal in violation of fundamental due process and ethical standards. See *Hazel-Atlas Glass Co. v. Hartford-Empire Co.*, 322 U.S. 238, 246 (1944) (fraud upon the court "is a wrong against the institutions set up to protect and safeguard the public").

194. Soon thereafter, Plaintiff contacted 'Muna Kahali' in relation to the agreed settlement with SCCC and requested that the website [www.sussexcountycommunitycollege.com] remove all information pertaining to Plaintiff's evidence submissions against SCCC. This request was approved.

195. On August 8, 2023, Plaintiff received $18,893.00 in a wire transfer

authorized by Manal Meseha of Sussex County Community College.

196. On August 9, 2023, Stephen J. Edelstein informed Newton Municipal Court Judge James P. Sloan, that 'on behalf of Sussex County Community College and College President Jon Connolly, we [Weiner Law Group LLP] respectfully request that both matters against the defendant, Lee Coffey, be dismissed.'

197. At the next court appearance, the remaining criminal Municipal charges issued against Plaintiff were “dropped.”

198. In response to this decision, SCCC officials stated that Jon Connolly began to 'demonstrate symptoms of a mad man', and further claimed that Connolly began to develop an 'unhealthy obsession' with Plaintiff for 'publicly humiliating him.'

199. It was revealed during this time that Jon Connolly, Kevin Shaw and other unnamed defendants plotted to 'murder Plaintiff.'

200. Over the next few days, Jon Connolly in consultation with several unknown defendants planned and fabricated a criminal conspiracy to have Plaintiff 'sent to prison.'

201. Plaintiff upon receiving an anonymous tip against his life, moved away from Sussex County.

202. On August 19, 2023, David Castner, a signatory to Plaintiff’s July 25, 2023 “settlement” was killed suddenly and unexpectedly in a motorcycle accident in New York State.

203. On August 22, 2023, a bomb threat was allegedly made against the college by Karl Taguinod, a 24-year-old former student from Sparta Township.

204. On August 23, 2023, approximately 70-100 law enforcement officers descended on Taguinod's home. It was reported on that 'the Newton Police Department, Sussex County Prosecutor's Office, Sparta Police Department, New Jersey State Police TEAMS unit, New Jersey State Police Bomb Squad, Andover Police Department, Vernon Police Department and the Sussex County Sheriff's Office all assisted executing an emergency arrest warrant signed by Newton Municipal Court Judge Peter Fico.'Jon Connolly then responded to the media by stating 'Sussex County Community College is grateful to our security team and law enforcement for working together to peacefully resolve this matter. We are also appreciative of community members who reached out with concern for the school and demonstrated great patience during this dynamic situation.'

205. Newton Police Chief Steven VanNieuwland further responded to the media by stating 'It was nearly 7 p.m. on Tuesday, August 22 when Newton Police officers responded to a bomb threat on the campus. They evacuated the college and kept it closed through the night and into Wednesday.'

206. An unnamed defendant later disclosed that 'authorities' orchestrated a 'false flag operation' in an effort to manufacture Plaintiff into 'making a similar bomb' threat against the college. This was claimed to have been intended to be used as a pretext to 'finally shut him [Plaintiff] up.' The source stated that after Plaintiff 'went ghost' authorities, and parties familiar with the plan 'shifted the blame onto Taguinod', citing his 'overt preexisting mental health conditions.'

207. On August 24, 2023, approximately 7 months after Plaintiff's altercation with SCCC international student housing landlord Kevin Shaw, Plaintiff was formally indicted by a Grand Jury for third degree aggravated assault.

208. On September 26, 2023, Plaintiff was arraigned before Superior Court Judge Michael C. Gaus.

209. Special Deputy Attorney General / Acting Assistant Prosecutor Jerome P. Neidhardt represented the State of New Jersey.

210. Plaintiff was represented by Public Defender Thomas Militano.

211. Unknown to Plaintiff at the time, Michael C. Gaus was the husband of Janet C. Lucas of Laddey Clark and Ryan LLP.

212. Janet C. Lucas, whose real name is Janet Gaus, operated under her maiden name Lucas, while working in her professional capacity as Special Counsel Of Sussex County Community College when Plaintiff was previously suing the institution.

213. Janet C. Lucas had significant personal knowledge of Plaintiff as she regularly liaised with Jon Connolly, Stephen J. Edelstein of Weiner Law Group LLC, alongside unnamed defendants from Florio, Perrucci, Steinhardt, Cappelli, Tipton, & Taylor and Porzio, Bromberg & Newman.

214. Over the course of his early court appearances, Plaintiff was subject to excessive hostile conduct and substandard treatment from Michael C. Gaus, who did not disclose his spouse's conflict as per judicial fiduciary duty.

215. On October 11, 2023, Jasper Cramp, Rickson Hill, Alessandro Filleti, Kane Fisher and Alex Davies filed lawsuits in the Sussex Vicinage Special Civil Part against Kevin Shaw.

216. On October 12, 2023, Sebastian Stephen, Jay-Leigh Amour filed lawsuits in

the Sussex Vicinage Special Civil Part against Kevin Shaw.

217. On October 13, 2023, Ethan Streeter, Mathew Goldfinch, Adam Moosa and Adrian Hernandez Rodriguez, Darcy O'Connor, Kieran Ouellette and Sven Waldmeier filed lawsuits in the Sussex Vicinage Special Civil Part against Kevin Shaw.

218. On November 17, 2023, Plaintiff was denied enrollment to the Pre-Trial Intervention program (PTI) by Acting Assistant Prosecutor Jerome P. Neidhardt.

219. However, Plaintiff was previously approved for the PTI program by the Criminal Division Manager, Scott Bottomley earlier in the year.

220. Acting Assistant Prosecutor Jerome P. Neidhardt upon explanation the State of New Jersey's PTI rejection of Plaintiff included the following '[Plaintiff] demonstrates continuous anti-social behavior, it is my understanding that after this assault, he [Plaintiff] was expelled from the Sussex County Community College and there has been a lot of information provided to my office [unknown defendants] that indicated that Mr. Coffey then set up a fake website that purported to be the official website of the Sussex County Community College. This website posted all sorts of negative and untrue information about Dr. Shaw and officials at the college. The college interacted with my office numerous times as they believed Mr. Coffey was extorting them as he demanded payment or reimbursement of tuition.'

221. In his closing remarks Jerome P. Neidhardt states that 'society would be harmed by abandoning criminal prosecution and this harm would outweigh any benefit to society if Mr. Coffey were to be diverted into PTI and have his charges dismissed.'

222. Plaintiff indicates his intention to proceed pro-se as a self represented litigant in his criminal trial, due to a 'consistent dereliction of duty' from Sussex County Office of the

Public Defender Thomas Militano.

223. Assistant Prosecutor Neidhardt's investigatory conduct represents a grave and deliberate abuse of prosecutorial authority, rooted in unsubstantiated hearsay, prejudicial rumor, and calculated character assassination rather than admissible evidence or lawful procedure. By engaging in extra-judicial, collusive communications with unidentified agents of Sussex County Community College, Neidhardt intentionally tainted the judicial process and deprived Plaintiff of impartial consideration and statutorily mandated diversionary relief wherein Plaintiff was eligible. These actions were executed with malice and reckless disregard for Plaintiff's rights, amounting to a clear violation of due process under the Fifth and Fourteenth Amendments.

224. The Supreme Court's holdings in *Napue v. Illinois*, 360 U.S. 264 (1959), and *Brady v. Maryland*, 373 U.S. 83 (1963), unequivocally prohibit the use of false, misleading, or undisclosed material to secure an adverse judicial outcome. Neidhardt's misconduct, by weaponizing institutional power to distort the facts and foreclose relief, is emblematic of a coordinated pattern of state-sanctioned retaliation. Such conduct fundamentally undermines the integrity of the judiciary and compels the strongest possible sanction to preserve public trust in the rule of law.

225. Additionally, Assistant Prosecutor Neidhardt's actions, as pleaded herein, fall squarely outside the bounds of absolute prosecutorial immunity as delineated by the Supreme Court in *Buckley v. Fitzsimmons*, 509 U.S. 259, 273–76 (1993). In *Buckley*, the Court held that prosecutors are not shielded by absolute immunity for investigatory conduct or for fabricating evidence prior to the initiation of judicial proceedings.

226. On December 14, 2023, at an Intensive Case Disposition Conference (ICDC),

Acting Assistant Prosecutor Jerome P. Neidhardt in an attempt to sabotage Plaintiff's ability to move self represented, asked the court to authorize a baseless 'no contact order' against Plaintiff. The filing requested that Plaintiff have 'no contact, direct or indirect, with the SDAG/Acting Assistant Prosecutor assigned to the case.'

227. On February 5, 2024, Plaintiff, still through Counsel, formally appealed the State's PTI rejection.

228. On, or around February 9, 2024, then-President Jon Connolly of Sussex County Community College (SCCC) experienced a severe mental health crisis, widely observed and reported by SCCC faculty, administrative staff, and local law enforcement. The crisis, intensified by mounting legal scrutiny and public criticism of Connolly's leadership, precipitated alarming conduct including explicit threats to "take someone's life in relation to the letter," reckless attributions of blame to Plaintiff, and erratic workplace behavior that jeopardized the safety and well-being of students and employees.

229. Multiple members of the SCCC administration, including Vice President of Student Success and Institutional Effectiveness Corey Homer, became aware of Connolly's deteriorating state after an anonymous faculty letter criticizing Connolly's leadership prompted a direct and violent reaction from Connolly. Homer promptly relayed these concerns to Chief Operating Officer James Gaddy and to Acting Executive County Superintendent and Trustee Gayle Carrick who was on SCCC's campus.

230. In response, Carrick, in concert with other administrators, orchestrated a clandestine internal operation to "infiltrate, locate, and find" the personal firearm that Connolly was reported to be repeatedly bringing onto campus. Notably, Carrick, Gaddy, Keith Festa, and Stacey Caputo executed this operation without notifying the Newton

Police Department in an official capacity, intentionally suppressing the gravity of the threat and prioritizing institutional self-preservation over public safety. Carrick, on her own admission, instructed her team to keep the incident "in-house," and explicitly stated she was "asking for this favor as a friend and not a board member or superintendent."

231. After a failed search of Connolly's office, further consultation with SCCC Board Chair Kurt Gewecke and renewed college counsel Vito Gagliardi, led to the belated conclusion that the matter required police involvement. However, rather than placing an official call, Gaddy, Festa, and Caputo contacted Newton Police Chief Steven Van Nieuwland on his personal cell-phone device and, during the conversation, stressed the need to "not make a big deal of this," characterizing the matter as a "wellness issue" rather than a potential criminal or institutional emergency.

232. Chief Van Nieuwland subsequently contacted the Sussex County Prosecutor's Office (SCPO). Rather than taking direct law enforcement action, the SCPO, in an act of official malfeasance, advised SCCC officials to retroactively legitimize Connolly's possession of a firearm by "making a policy in writing," thereby seeking to shield Connolly from legal consequences and undermine statutory requirements.

233. It was revealed that SCCC Chair Kurt Gewecke's daughter, Kayla Gewecke, an employee at the Sussex County Prosecutor's Office, was giving her father "insider information."

234. Newton Police Department, represented by Chief Van Nieuwland, further acquiesced, suggesting, "let's not take this further than it has to go," and warning that the discovery of an improperly registered firearm could result in a "fiasco." The institutional consensus, reaffirmed by Gaddy, Festa, and Caputo, was that "they don't want to get

anyone in trouble," resulting in a deliberate and non-enforcement of law and neglect of public safety duties.

235. The investigation was summarily cancelled while the whereabouts of the missing firearm remained unresolved, notwithstanding heightened security concerns stemming from the bomb threat incident at SCCC in August 2023.

236. On or about March 11, 2024, approximately forty-eight hours after the aborted investigation into the disappearance of SCCC President Jon Connolly's firearm and the Newton Police Department's coordinated refusal to enforce applicable law, President Connolly affirmatively invited Chief Operating Officer James Gaddy to his private residence located at 920 Mt. Benevolence Road, Newton, New Jersey 07860 to "discuss the topic at hand."

237. Gaddy attended the meeting and recorded it.

238. Connolly's statements during the covertly recorded conversation evinced not only escalating paranoia and retaliatory animus toward Plaintiff, but a persistent and deeply personal vendetta that posed an ongoing threat to both Plaintiff and the campus community. Connolly repeatedly fixated on video surveillance, expressly attributing it to his concerns about Plaintiff, and made pointed inquiries regarding Plaintiff's movements and the status of internal whistleblowing. Most damningly, when confronted by Gaddy, Connolly unequivocally admitted, "yes, I did," to possessing a firearm in his office during the "Lee Coffey situation." He then confirmed, with marked relief, that the internal search "found nothing," and proceeded to laugh about having "taken the gun back out" once the perceived threat—namely, Plaintiff—had abated. These statements constitute direct party opponent admissions of deliberate misconduct, a calculated abuse of authority, and a

willful disregard for both institutional policy and public safety, further underscoring the grave and ongoing risk presented by Connolly's conduct.

239. Connolly further evinced unambiguous relief and satisfaction upon learning that the Board-sanctioned search for his firearm had failed. Connolly, seeking reassurance, directly inquired, "they found nothing right?" to which James Gaddy confirmed, "they found nothing," prompting Connolly's audible laughter—an unmistakable display of self-satisfaction and a conspicuous absence of remorse or accountability for his grave misconduct.

240. Gaddy, acting in his official capacity as Chief Operating Officer, repeatedly cautioned Connolly regarding the mounting institutional and legal exposure engendered by Connolly's actions, referencing concerns over Connolly's "mental health," the hostile work environment, and the cascading liability for Sussex County Community College.

241. However, the conversation exposes Connolly's reckless self-justification, as he describes his conduct and reasoning for carrying the firearm as "more of testosterone, mixed with fear, mixed with anger."

242. The conversation reveals Connolly's escalating paranoia and retaliatory intent, including pointed inquiries into the precise timing and authorization of the office search—"at what point in your conversation with Gayle and Kurt and so forth did it come up about when they would know that I knew that people went in there? or was I to never know… Folks went in there?"

243. The transcript establishes, with irrefutable clarity, that senior SCCC

administrators—including Gaddy, Carrick, Caputo, and Chair Kurt Gewecke—deliberately concealed the severity of the firearm incident and the associated mental health crisis from law enforcement and the public, opting instead for an "in-house" cover-up and coordinated deception. Gaddy's statements, "we kept it extremely contained, you know like, there were people in the boardroom, they knew nothing about what we were doing… there was a very specific reason, and if not for that mental health training (laughing), we probably would have never considered it," demonstrate a knowing and willful conspiracy to obstruct accountability and shield Connolly from professional and criminal consequences.

244. In closing, the transcript further confirms that Connolly possessed no lawful policy authorization to retain or store a firearm on campus premises. As articulated by Gaddy during the exchange, SCCC's written policy strictly limits firearm possession on college grounds to retired law enforcement officers with explicit, written approval—criteria Connolly indisputably failed to satisfy. Despite repeated reminders of this legal and institutional requirement, Connolly exhibited no intent to comply, and instead treated the matter with flippancy and disregard, as evidenced by his laughter and evasive responses. This clear absence of policy authorization, combined with Connolly's willful circumvention of institutional safeguards and his conscious efforts to conceal the firearm incident from oversight authorities, underscores the deliberate nature of his misconduct. The record thus establishes that Connolly's conduct was not only unauthorized but calculated to evade detection and accountability, rendering the institution and its leadership complicit in a profound breach of public trust and campus safety.

245. The conduct at issue was not merely the product of individual malfeasance,

but the direct result of Sussex County Community College's de facto policy and custom of ignoring critical safety protocols and condoning misconduct by senior officials. The Board's repeated failure to enforce written firearm policies, despite clear notice and opportunity to act, constitutes deliberate severe indifference, as defined in *Monell v. Department of Social Services*, 436 U.S. 658, 694 (1978). This institutional inaction and willful concealment created the very conditions that enabled Connolly's unlawful acts and subjected Plaintiff to ongoing retaliation and constitutional harm.

246. On February 28, 2024, Chief Operating Officer James Gaddy, Human Resources Coordinator Marianne Sharpe and Student Success Advisor Jason Boehm, appeared at the Sussex County Board of County Commissioners meeting to inform the board of their grievances against SCCC and Jon Connolly.

247. The Sussex County Board of County Commissioners consisted of the following individuals, Jill Space, Chris Carney, Jack DeGroot, William Hayden, Earl Shick.

248. James Gaddy testified to the Commissioners that Jon Connolly 'ordered him [Gaddy] to do both illegal and unethical things [in Gaddy's role as Chief Operating Officer].' Gaddy also commented that 'over the past nine months something that has changed' and that 'our president [Jon Connolly] demonstrates the signs of a person who is not well.' Gaddy further elaborated that 'he [Jon Connolly] demonstrates symptoms of someone who is paranoid and who thinks the world is out to get him.' Gaddy ended his comments with 'the stories i have heard about retaliatory behaviour, testing the loyalty of people, not to the college but to Doctor Connolly were frightening to me, this type of behavior has only increased in the last several months.'

249. Marianne Sharpe in her capacity as SCCC Human Resources Officer testified to

the Commissioners after Gaddy by stating 'under the current president [Jon Connolly] I have seen, felt and experienced a sense of intimidation, fear, instability, turmoil, hypocrisy, toxicity and have also felt physically unsafe on multiple occasions.' Sharpe also commented that 'many of my co-workers are aware of this situation and have also experienced and witnessed similar situations and have expressed their fear to me to speak up, my livelihood here has also been threatened more than once and I continue to be on edge. I am also very uneasy providing this information. I am not the first individual to experience or be subjected to this intimidation, abuse of power and corruption, I am just one of many, as a reference here are some of the issues… the Lee Coffey issue.'

250. Jason Boehm in his capacity as Student Success Advisor testified to the Commissioners that the Sussex County Community College was 'was running an operation two-steps away from child slavery'; Boehm is also heard urging the Sussex County Board of County Commissioners 'to step in.'

251. The Sussex County Board of County Commissioners failed to investigate these alarming comments and further demonstrated a clear dereliction of duty owed to Plaintiff and the residents of Sussex County amidst significant public pressure.

252. On March 20, 2024, Plaintiff's PTI application was denied by Superior Court Judge Michael C. Gaus.

253. On the same day, Plaintiff elected to proceed in his criminal defense as a pro se litigant. After a humiliating, excessive and intrusive probing from Superior Court Judge Michael C. Gaus, who used this forum as an opportunity to belittle and harass Plaintiff.

254. After numerous hours of questioning, Plaintiff was allowed to proceed pro-se.

255. Plaintiff immediately requested 'comprehensive discovery' from the Sussex County Prosecutor's Office, wherein Superior Court Judge Michael C. Gaus intervened to convince Plaintiff to receive a 'digital copy' instead of a 'physical copy of the evidence.'

256. Plaintiff affirmed that we would like 'comprehensive physical discovery' and would pay the required fees to obtain it.

257. Acting Assistant Prosecutor Jerome P. Neidhardt unhappy with this decision, made comment to Superior Court Judge Michael C. Gaus that 'he does not want to be alone with him [Plaintiff]' and that 'he [Plaintiff] presents a safety risk to the Sussex County Prosecutor's Office staff if he were to come alone [to collect physical evidence].'

258. Superior Court Judge Michael C. Gaus encouraged Acting Assistant Prosecutor Jerome P. Neidhardt to have 'additional backup.'

259. On March 26, 2024, during a duly convened public meeting of the Sussex County Community College Board of Trustees, Chief Operating Officer James Gaddy appeared before the Board and, acting in his official capacity, played an audio recording from his personal mobile device. Gaddy publicly attested to the authenticity and relevance of this recording, emphasizing its critical connection to serious allegations of misconduct implicating then-President Jon Connolly. This act was undertaken in open session, in full view of the Board, senior staff, and numerous members of the public, and was motivated by Gaddy's documented concern for campus safety and institutional integrity.

260. Gaddy expressly stated on the record that the audio had been captured within forty-eight hours of a major incident on July 9, 2024, involving President Connolly's possession of a personal firearm on college premises—a crisis that precipitated significant

campus unrest and internal investigation. The recording, although claimed "partially inaudible in the official record", was submitted as direct proof that Dr. Connolly had personally admitted, and indeed boasted, about "having a gun for Lee Coffey [Plaintiff]." Gaddy's statement to the Board and the submission of the recording served to rebut contemporaneous claims by Connolly that these allegations were fabricated, thus directly corroborating Plaintiff's prior assertions of retaliatory threats and targeted intimidation by the College's highest executive.

261. The public presentation of these revelations provoked immediate and audible shock from those in attendance, including gasps of alarm and expressions of concern among Board members, faculty, and students. Despite the gravity of these disclosures and the corroborative evidence provided, the Board of Trustees failed to act on Gaddy's whistleblower report, did not conduct a transparent follow-up investigation, and took no remedial action against President Connolly. This willful institutional inaction in the face of direct evidence of official misconduct further substantiates Plaintiff's claims of systemic retaliation, suppression of dissent, and deliberate indifference to constitutional and statutory rights, exposing the College and its governing officials to significant civil liability under federal and state law.

262. Soon thereafter, a Change.org petition was made to 'demand transparency and accountability at SCCC.'

263. This Change.org petition received over 1,075 signatures.

https://www.change.org/p/demand-change-and-transparency-at-sussex-county-community-college

264. No follow-up investigation was ever conducted by the Sussex County Board of County Commissioners, Sussex County Prosecutor's Office or Newton Police Department after significant public scrutiny and complaints.

265. On May 3, 2024, Plaintiff collected discovery from the Sussex County Prosecutor's Office located on 19 High St, Newton, NJ, 07860.

266. On May 7, 2024, Plaintiff discovered suppressed video evidence that was not sent to Plaintiff previously.

267. The suppressed video evidence was the crime-scene body-worn camera footage from Newton Police Department Officers Steven Siek, Eric Soroka and Michael Wolanski.

268. The footage showcased elements of conspiracy, corruption and a further malicious prosecution from the Newton Police Department, who originally charged Plaintiff with third degree aggravated assault.

269. More concerningly, Plaintiff previously requested this crime-scene footage through both an OPRA request directly to the Newton Police Department and through a 'discovery client copy request' filed with the Public Defender's Office. This material was not turned over.

270. Over the next 60 days, Plaintiff began creating his self-represented criminal defense in anticipation for trial with the new discovery material.

271. On August 5, 2024, Plaintiff's proposed Voir Dire questions were rejected by Superior Court Judge Michael C. Gaus.

272. On the same day, Catherine Williams, Secretary to Michael C. Gaus, supplied Plaintiff with the Pre-Trial Memorandum.

273. The final Trial-Status Conference was scheduled for August 12, 2024.

274. On August 8, 2024, case management rescheduled the final Trial-Status Conference, at the request of Acting Assistant Prosecutor Jerome P. Neidhardt to August 22, 2024.

275. On August 22, 2024, at a Trial-Status Conference, Superior Court Judge Michael C. Gaus asked if Plaintiff had 'intentions to subpoena any relevant individuals relating to his criminal defense.'

276. Plaintiff informed Superior Court Judge Michael C. Gaus that he was in the process of sending subpoenas to the following individuals, Jon Connolly, Cory Homer, Steven Siek, Eric Soroka, Michael Wolanski, Herbert Yardley, Eric Wood, Michael Bucci and Rachel Bucci.

277. In response to Plaintiff's comments, Superior Court Judge Michael C. Gaus amended the trial date from September 30, 2024 to September 16, 2024, restricting Plaintiff's effectiveness to process serve within the statutory window.

278. On the same day, Plaintiff filed 14 in-limine video motions with the court and supplied Acting Assistant Prosecutor Jerome P. Neidhardt with physical copies of all 14 discs.

279. Plaintiff's 14 in-limine motions were filed as physical discs with a chain of custody report, technical specifications and transcripts to ensure eligibility and compliance with New Jersey Rules for Evidence.

280. Plaintiff's motions contained comprehensive and overwhelming evidence of Kevin Shaw's violent history and his abuses against Plaintiff.

281. Plaintiff's first in-limine motion showcased two handheld video recordings that Plaintiff took at SCCC that showcased Kevin Shaw's stalking and harassment, the transcripts are as follows:

Item 1:

[00:00:00.13] - LEE COFFEY

Why you pulling up? Go away. Go away, mate. Leave me alone.

[00:00:05.07] - KEVIN SHAW

I know what you've been up to.

[00:00:06.21] - LEE COFFEY

Leave me alone.

[00:00:07.11] - KEVIN SHAW

I know what you've been up to/.

Item 2:

[00:00:00.23] - LEE COFFEY

You are harassing me at my college, go away please.

[00:00:00.23] – KEVIN SHAW

Have a great day.

282. Plaintiff also included a Newton Police Report he filed against Kevin Shaw in

this in-limine motion.

283. Plaintiff's second in-limine motion showcased the full crime scene video surveillance footage from Steven Siek, Eric Soroka and Michael Wolanski that was suppressed by the Newton Police Department, Sussex County Prosecutor's Office and Office of the Public Defender.

284. Plaintiff's third in-limine motion showcased another angle of the full crime scene video surveillance footage from Steven Siek, Eric Soroka and Michael Wolanski.

285. Plaintiff's fourth in-limine motion showcased a clipped version of the video surveillance footage from Steven Siek, Eric Soroka and Michael Wolanski wherein the respective officers are heard conspiring and colluding to amplify Plaintiff's charges. A chain of custody report is attached and the transcripts are as follows:

Item 1

[00:00:03.18] - PATROL SOROKA

Excuse me for a second. Talk to the boss here. All right, so what we have is he rents out these houses here. Previous tenant. They evicted him for either nonpayment or trashing the place. He came here today to give doctor Shaw a piece of paper, I guess some sort of court order. And from what we know is he told them to get lost. And it sounds like he just cold clocked him.

Victim passed out.

[00:00:40.07] - SEREGANT WOLANSKI

One punch?

[00:00:41.19] - PATROL SOROKA

Yeah, one punch. Victim got knocked out. Guy took off. He has definitely, like, a hematoma bump right here, possibly dislocated elbow. And he was out for about a minute, and now he just has repetitive questioning. Right. Don't really have a full witness. The one. The one younger gentleman here turned away, but as he turned back, he said he saw the follow through, the guy following through with the punch, and he saw the victim laying down. We're waiting for the son. There's cameras literally pointing at where it happened.

[00:01:30.07] - SEREGANT WOLANSKI

Great. It happened right out on the porch.

[00:01:32.09] - PATROL SOROKA

Right on the porch.

[00:01:33.06] - SEREGANT WOLANSKI

Okay, so.

[00:01:35.02] - MILES SHAW

You guys haven't seen a phone have you?

[00:01:40.07] - PATROL SOROKA

Is that your father's? Yeah. Anything that might be outside if he was holding it. So, we have a witness statement from the guy who saw the follow through. I have a witness statement from a lady who heard part of the argument. Waiting to get a witness statement from the victim's wife. She's just kind of going back and forth right now. And the victim just has repetitive questioning, asking, I was knocked out. I'm in pain.

[00:02:18.27] - SEREGANT WOLANSKI

But he definitely remembers what happened?

[00:02:22.05] - PATROL SOROKA

He remembers, I think, getting hit, but he doesn't remember much else. [00:02:28.24] -

SEREGANT WOLANSKI

So basically, in this, I mean, there's a lot going on. I mean, he had the right to be here

because he was handing the paper. As far as, like, him getting passed out or passing out,

possible fracture or whatever, it sounds bad. That's why I asked Eric if it was just one

punch. If it's one punch, then you have that presumption. Is it normal to believe that a

single punch can cause that type of damage? The answer is no. You can't presume it.

Unless he is, like, an MMA (Mixed Martial Art) guy. Then it’s an aggravated assault. But,

you know, that's something that we have to (prove), like right now what we're looking at is

a DP assault, I believe. I mean, unless you guys want to change or add to it or whatever.

But DP assault, as far as, like, everything else goes, if it is determined that it is a DP

assault, obviously he can be charged, but unless he admits it, we observe it personally, even

if we observe it on the camera, can still be charged. But not arrested, or it’s disturbing the

peace, which is not something (we want to do). So we kind of have to understand first what

we have here.

[00:04:02.27] - SEREGANT WOLANSKI

We can obviously detain him, but there are a lot of questions we're going to have to ask him. So we're going to have to determine what happened, his side, and then what his background is, and his background is it like MMA (Mixed Martial Arts) fighting or something, now he's just increased his injuries a little bit deeper, now it's possibly, be, you know, rise to an aggravated.

[00:04:29.27] - PATROL SOROKA

So I've called them a couple times.

[00:04:31.06] - SEREGANT WOLANSKI

The first time I called it didn't answer, at least now it's ringing a bit, So I'll give him a few more minutes and then I'll leave him a slightly different message.

Item 2

[00:00:00.06] – VIDEO OF ALTERCATION PLAYING ON DEVICE

Item 3

[00:00:01.02] - PATROL SOROKA

You see that?

[00:00:02.15] - SEREGANT WOLANSKI

So when we speak to him and Siek will take this one. When we speak to him, if he admits to us

that he did it, handcuffs are going on him and he's being arrested.

[00:00:17.06] - PATROL SOROKA

I mean, doctor Shaw, he asked him to. He asked him to leave, and then he [Shaw] got in his [Plaintiff's] face. He [Shaw] approached him [Plaintiff], but then the guy [Plaintiff] hit him.

[00:00:25.28] - SEREGANT WOLANSKI

So, like I said, he could be charged just off of the video. As far as the arrest goes, just assuming there's no MMA type thing, or he is a professional boxer or something like that, it's done in our presence. The kid admits to it, or it's a breach of the peace. Breach of the peace is gone. It wasn't done in front of us. Even though we watched the video, it's not done in front of us. When we talk to him about it, if or when he admits he did it, he will be handcuffed and arrested.

[00:01:00.28] - SEREGANT WOLANSKI

So I'm going to chat to Dave. I'm going to find out where the soccer players live, see if I can get a good number on him or have one of those guys call and basically let him know. If we don't make contact with, you know, with him, in 20 minutes, there's gonna be a warrant for his arrest.

Item 4

[00:00:00.05] - PATROL SOROKA

I mean, that was. That was a solid hit. [00:00:03.11] -

SENIOR OFFICER SIEK

That was a solid hit.

[00:00:04.28] - PATROL SOROKA

And a solid hit again.

[00:00:10.05] - PATROL SOROKA

So what do you think right now? That you were kind of the supervisor over the past few years and you were letting the kids take calls? What are you thinking? What do you want to do.

[00:00:27.15] - SENIOR OFFICER SIEK

Find the guy, talk to him, and either four by niner or… cuff me.

[00:00:32.16] - SENIOR OFFICER SIEK

I mean, after watching the video, it's cut and dry now. [00:00:35.23] -

PATROL SOROKA

Memoranzide him, talk to him, get him to admit it.

[00:00:35.27] - PATROL SOROKA

And then we will be good with it. [00:00:35.28] -

PATROL SOROKA

We'll ask um, you won't have to say right now, but let's see what kind of training he has. Maybe who knows.

[00:00:56.02] - PATROL SOROKA

That was a really good punch that you threw.

[00:00:58.03] - SENIOR OFFICER SIEK

Yeah.

[00:00:59.09] - PATROL SOROKA

Do you have any training in martial arts?

[00:01:00.15] - PATROL SOROKA

He's like yeah I practice BJJ (Brazilian Ju-Jitsu).

[00:01:01.21] - PATROL SOROKA

Okay.

[00:01:02.27] - PATROL SOROKA

We'll escalate it.

[00:01:05.12] - SENIOR OFFICER SIEK

And that's what's so weird. Wolanski is the only one with the thought process of simple assault in this department.

[00:01:19.12] - PATROL SOROKA

If you know how to fight and you know what you're doing, it changes everything.

[00:01:27.26] - SENIOR OFFICER SIEK

Just gotta figure out where he is. It's weird that he went that way.

[00:01:33.04] - PATROL SOROKA

His car was probably there.

[00:01:41.17]

(Background noise)

[00:02:40.04] - ATI SHAW

What are our rights about this actual physical assault? [00:02:45.23] -

PATROL SOROKA

So that's exactly what it's called. Simple assault. So the state of New Jersey is considered a disorderly person's offense right now. There's certain criteria that we have to prove in order to charge what's his name.

[00:03:00.03] - PATROL SOROKA

Coffey

[00:03:01.06] - ATI SHAW

Lee

[00:03:01.10] - PATROL SOROKA

So we need to find him first. We have to talk to him. If he admits to it, we can charge him with a simple assault. Even though we have a witness and camera footage, the state of New Jersey doesn't recognize that as us viewing the actual event that happened.

[00:03:22.04] - PATROL SOROKA

Say one of us was driving by and we physically saw him get punched. Punched. Then we could act. But we need to talk to him. Even though we have video.

[00:03:32.26] - PATROL SOROKA

I mean, even though we have video is pretty clear cut. We need him to admit it.

[00:03:42.03] - ATI SHAW

If he doesn't admit, then he's scot free? [00:03:48.23] -

PATROL SOROKA

If he's adamant that it wasn't him. Obviously we're gonna have video push him during more likely an interrogation.

286. Plaintiff's fifth in-limine motion showcased a conversation between Plaintiff and Kevin Shaw while Plaintiff was a resident at Kevin Shaw's property. The transcripts are as follows:

Item 1

[00:00:00.360] - KEVIN SHAW

I am not a landlord. I own properties. But this is not a landlord relationship. Ask the President of the college and The Dean and your coaches. Guess what I'm going to do.

[00:00:13.190] - KEVIN SHAW

I'm going to further protect myself. And guess how I'll do that. I'll eliminate the program. I eliminate my problems. My standards are not out of the ordinary.

[00:00:25.380] - KEVIN SHAW

They're acceptable by the (college) administration. They're acceptable by your coaches. My conversations that weekend were with the president of the school and the head administrator, The Dean.

[00:00:37.600] - KEVIN SHAW

There's a reason I have the relationship with the community college that I have, and you don't even know what I have planned.

[00:00:45.280] - KEVIN SHAW

Did I lose it on Sean? Yeah. Why? Cause I will let him finish his academics. And then I made it emphatically clear that every one of these encounters is reason for me to terminate this program.

287. Plaintiff's sixth in-limine motion showcased another conversation between Plaintiff and Kevin Shaw while Plaintiff was a resident at Kevin Shaw's property. The transcripts are as follows:

Item 1

[00:00:01.120] - KEVIN SHAW

[Shaw reading Plaintiff's text message] 'I would like to reiterate that you are under no circumstances allowed to just go in my room without prior notice.' If you think you can speak to me this way, tell me that I can't open your door for you to think that you can tell me that I can't walk through my house and it's your bedroom. We're not on the same page for you to tell me. I would just like to reiterate that under no circumstance, I don't have time to waste. I really don't. This is the deal. The disrespect that's here, I should pass it to administrators. All right, I should. That you have some kind of rights over me. How would you like to leave?

288. Plaintiff's seventh in-limine motion showcases a conversation between Sean Morgan and Kevin Shaw. Plaintiff brought this recording to the attention of SCCC officials. The transcripts are as follows:

Item 1

[00:00:08.510] - KEVIN SHAW

If you don't have my rent today, you'll be asked to leave tomorrow.

[00:00:12.530] - SEAN MORGAN

Yes, sir. Yes, sir.

[00:00:14.850] - KEVIN SHAW

You can walk yourself down to the 711 and get me my money, all right? I'm not playing games with you anymore. And I'm not falling for your lies anymore, either.

[00:00:24.510] - SEAN MORGAN

Doctor Shaw, how am I lying? I asked you if I could wire Shaw the money because I can't find my card.

[00:00:28.100] - KEVIN SHAW

You can't find your card conveniently, but I'm sure you'll find your card. So you can go get chicken or whatever else you like. Sean. Don't play me like I'm a fool, Sean you do all the time and you do other people. You do other people all the time, and you're welcome to leave. I do not

have my money today. I will have you escorted out of my property tomorrow, and you can find a ride back to Maryland. Am I clear?

[00:00:52.680] - SEAN MORGAN

Sir, contrary to what you believe, sir, I don't have. Okay? I don't. I don't think. I don't think you know me. I'm not trying to lie to you or anything,

[00:01:00.100] - KEVIN SHAW

Sean. I'm done. I'm done with the conversation. You call me this afternoon when you have my money, and if you don't have my money tomorrow, this is what I'm going to tell you.

[00:01:08.240] - KEVIN SHAW

I'm asking you to leave. I'll have you escorted out. I'm not playing games with you anymore, Sean. I am not playing games. And I'm not one of your chums, okay? You're. You're manipulative. I don't think you are trustworthy. Call me and notify me when you have my money this afternoon.

[00:01:27.000] - SEAN MORGAN

Yes, sir. Have a great day. May God be with.

289. Plaintiff's eighth in-limine motion showcases a conversation between Jasper Cramp, Tommy Taylor and Kevin Shaw. Plaintiff also brought these recordings to the attention of SCCC officials. The transcripts are as follows:

Item 1

[00:00:00.560] - KEVIN SHAW

Because if everybody thinks that we're all on the same page with regards to honesty and integrity and looking after my interests, it's always the guys looking after their interests.

[00:00:12.640] - JASPER CRAMP

Yep.

[00:00:13.540] - KEVIN SHAW

Thinking that the $300 is covered. So, Doctor Shaw is good. No, doctor Shaw still has somebody out there that's a vulnerability. A liar, a cheat, a scoundrel that won't come forward. So until I know who that person is. You know, the fact that Yannick (Yannick Ossinone) disrespected me within a day or two after I gave a directive and then told me he didn't know for his own private space with Lotte (Lotte Klueter). Are you kidding me? And Santi (Santiago Vasquez), two months later, disregarding it when I've said it so many times. And how many others? How many others? Those are the two that I'm aware of. How many others? And I have no freaking clue because I can't spend the time looking through the footage. Yeah, and if you think I just spend time looking through the footage. Come on, all the cameras are outside of the property. What's the look? And if it's in the kitchen, really, what's to look at? I mean, what am I going to be looking at, Jasper? I mean, what am I going to do with the footage? I know there's underage drinking. Come on, you know, nobody wants to be responsible.

[00:01:34.720] - TOMMY TAYLOR

Sure. Jasper has to eat now. All right, I'm his uncle.

[00:01:41.160] - KEVIN SHAW

Okay, I'm sorry.

[00:01:42.840] - TOMMY TAYLOR

I'm Jasper's uncle and he's at my house and we're going to have dinner right now. Okay?

[00:01:48.570] - KEVIN SHAW

Okay.

[00:01:49.260] - TOMMY TAYLOR

All right. Thank you very much.

[00:01:51.370] - KEVIN SHAW

I'm sorry.

[00:01:52.170] - TOMMY TAYLOR

I said thank you very much.

[00:01:53.890] - KEVIN SHAW

I'm sorry, who are you?

[00:01:55.390] - TOMMY TAYLOR

My name is Tommy Taylor. I'm Jasper's uncle.

[00:01:59.290] - KEVIN SHAW

What, so you've been listening to my conversation?

[00:02:01.310] - TOMMY TAYLOR

Negative. I just came in the room. Just now. I came in to get him a hamburger.

[00:02:06.510] - JASPER CRAMP

Yeah, he just came in the room.

[00:02:09.470] - TOMMY TAYLOR

All right, bud.

[00:02:10.160] - KEVIN SHAW

Well, well, uncle. Well, this is 45 minutes of my time, so enjoy your meal.

[00:02:16.040] - TOMMY TAYLOR

Okay. Thank you

[00:02:16.350] - KEVIN

SHAW

Jasper.

[00:02:21.220] - JASPER CRAMP

Yep.

[00:02:24.180] - KEVIN SHAW

So that's Jackie's dad?

[00:02:26.070] - TOMMY TAYLOR

Yes.

[00:02:26.800] - JASPER CRAMP

Yeah.

[00:02:29.340] - KEVIN SHAW

Honorable. Really honorable. Good for you, good for you. Go enjoy your meal.

[00:02:34.680] - TOMMY TAYLOR

Thank you, brother.

[00:02:36.180] - KEVIN SHAW

Yeah, don't call me brother.

[00:02:37.770] - TOMMY TAYLOR

Okay?

[00:02:38.350] - KEVIN SHAW

Not even close.

[00:02:39.090] - TOMMY TAYLOR

Okay.

[00:02:40.050] - KEVIN SHAW

Yeah. And I looked after your daughter.

[00:02:42.430] - TOMMY TAYLOR

No, you didn't. You did not. And listen.

[00:02:45.630] - KEVIN SHAW

Yeah, go ahead.

[00:02:46.380] - TOMMY TAYLOR

I own rentals myself, okay? So, putting a camera in a room is an invasion of privacy. You know that?

[00:02:52.370] - KEVIN SHAW

It's not in a room, it's in cognizant space.

[00:02:53.930] - TOMMY TAYLOR

And look, people walk around naked and you can see them.

[00:02:57.290] - KEVIN SHAW

Oh, right. And I'm gonna. I'm gonna jeopardize my livelihood by doing.

[00:03:01.240] - TOMMY TAYLOR

You could. You could do that. Jasper's done nothing wrong. Jasper has done nothing wrong to you. This guy has done nothing wrong to you. You call him up and you belittle him for hours. It's not fair to him. There's a lot of men in that house. It's not fair to him.

[00:03:15.680] - KEVIN SHAW

I'm sorry, Jasper. Have I belittled you?

[00:03:17.900] - TOMMY TAYLOR

Yeah. You just had him for 45 minutes breaking his balls. No one's starting fires in the house. The house is spotless, Mister Shaw.

[00:03:24.680] - KEVIN SHAW

Listen, Tommy, I don't need to waste my time with you

[00:03:27.070] - TOMMY TAYLOR

Ok good.

[00:03:27.750] - KEVIN SHAW

Listen, Tommy, he broke my three-hundred-dollar camera.

[00:03:29.570] - TOMMY TAYLOR

You're in violation of a lot of laws in that house.

[00:03:32.440] - KEVIN SHAW

Yeah, good luck with yourself, Tommy.

[00:03:33.640] - TOMMY TAYLOR

17 people in a freaking four bedroom. No escape from the top floor. No egress from the top floor. No egress.

[00:03:44.200] - KEVIN SHAW

I have a question Tommy, I'll tell you what, we can end this program right now. I'll call up the administrators.

[00:03:47.600] - TOMMY TAYLOR

And do what you got to do. Do what you got to do. You're in. Jeopardizing. You're jeopardizing people's lives. There's no regress from the top floor in that house. If that house goes on fire, someone's going to fucking die and you're going to end up paying for it. That's one. That's one rule that you broke. I'm tired of you picking on his kid. Pick on somebody else. He does the right thing in that house. He keeps it clean. He washes the baseboard. I know the whole story. Pick on somebody else in that house.

[00:04:13.170] - KEVIN SHAW

I'm sorry Jasper. Have I picked on you? Are you there, Jasper?

[00:04:19.890] - JASPER CRAMP

Like, yeah, um.

[00:04:22.470] - KEVIN SHAW

Have I picked on you? Jasper has this conversation.

[00:04:25.560] - TOMMY TAYLOR

45 minutes, you got him on the phone telling him about stuff that he knows already. He's done no damage to your house. None. He did not.

[00:04:37.400] - KEVIN SHAW

Oh, really? I'm sorry, Jasper. It's on a recorded conversation.

[00:04:42.440] - TOMMY TAYLOR

Okay? Okay. If he did. Why are you putting a camera in the house? You know it's against the law? It's not legal. It's not legal.

[00:04:52.440] - KEVIN SHAW

You show me the law that it's not legal.

[00:04:54.550] - TOMMY TAYLOR

Tommy, the guys haven't done anything to the house. All you do is call up Jasper and you belittle him. He doesn't even say one word to you. All you do is talk and talk and talk for an hour to the kid. Leave him alone. Pick on somebody else. We'll talk to you later. I'm going to hang up. Come on.

290. Plaintiff's ninth in-limine motion showcases a police interview between Steven Siek and Kevin Shaw.

291. Plaintiff's tenth in-limine motion contains admissible discovery provided by Plaintiff to the Sussex County Prosecutor's Office.

292. Plaintiff's eleventh in-limine motion showcases a police interview between Steven Siek and Plaintiff where Plaintiff is heard invoking his Miranda Rights.

293. Plaintiff's twelfth in-limine motion contains admissible discovery provided by the Sussex County Prosecutor's Office to Plaintiff.

294. Plaintiff's thirteenth in-limine motion showcases a Newton Police Department investigation between Michael Bucci, Rachel Bucci and Kevin Shaw. The transcripts are as follows:

Item 1

[00:00:03.06] - KEVIN SHAW

(Impersonating Michael Bucci) He's like get off my fucking property, who the fuck are you?

[00:00:03.09] - KEVIN SHAW

I know you reported me. I know.

[00:00:04.23] - KEVIN SHAW

I'm like, I promise you, I did not report you. I actually spared you. [00:00:08.03] -

KEVIN SHAW

I did. Other people. [00:00:09.04] -

KEVIN SHAW

And I just sat with the town manager to discuss High Street that I think is being neglected and I did not report that.

Item 2

[00:00:16.02] - RACHEL BUCCI

Of course.

[00:00:16.19] - MICHAEL BUCCI

He ran across the street, like, to come onto the property. She ran and met him here.

[00:00:21.07] - RACHEL BUCCI

He actually came halfway down the driveway

[00:00:23.22] - RACHEL BUCCI

She yelled.

[00:00:24.13] - RACHEL BUCCI

I said, please get off my property. [00:00:25.13] -

MICHAEL BUCCI

Her voice escalated after maybe five minutes, so I ran over to find out what happened, and then he kept. He kept agitating me. I'm like, you better back off my property. So, I'm like, just, why are you here? And I just. I said, just leave the fucking property.

[00:00:39.03] - RACHEL BUCCI

He wouldn't leave after that.

[00:00:39.24] - MICHAEL BUCCI

He was just. He kept it. Running his mouth for no reason.

[00:00:42.19] - MICHAEL BUCCI

Because he was. He was still on the property agitating us.

[00:00:47.15] - RACHEL BUCCI

That's somebody that needs to get hit.

[00:00:48.22] - NEWTON PATROL OFFICER

Might not have been you intentionally hit him.

[00:00:50.04] - MICHAEL BUCCI

I was like just back up. He was back up, and he just. I didn't swing on him. [00:00:54.11] -

RACHEL BUCCI

He's [Kevin Shaw] like one of those people that aggravates you until you want to hit him.

[00:00:57.21] - RACHEL BUCCI

And then he's like, oh, my God, they hit me.

295. Plaintiff's fourteenth in-limine motion was an expert voiceover annotation of the altercation between Plaintiff and Kevin Shaw.

296. On August 27, 2024, Acting Assistant Prosecutor Jerome P. Neidhardt filed his own in-limine motion for the underlying video evidence of the altercation between Plaintiff and Kevin Shaw to be introduced as trial evidence.

297. On August 29, 2024, both Plaintiff and Acting Assistant Prosecutor Jerome P. Neidhardt filed a differing 'statement of the case' to the court.

298. On the same day, Superior Court Judge Michael C. Gaus approved Acting Assistant Prosecutor Jerome P. Neidhardt's 'statement of the case' and rejected Plaintiff's.

299. Around this time, Acting Assistant Prosecutor Jerome P. Neidhardt asked Newton Patrol Officer Steven Siek to sign a prejudicial transcript of the surveillance footage from the underlying altercation between Plaintiff and Kevin Shaw. This transcript included factual inaccuracies and made Plaintiff appear more villainous and nefarious due to the misinterpretation of certain words. Steven Siek complied and signed the document.

300. On September 4, 2024, Plaintiff also contacted Newton Patrol Officer Steven Siek to sign a more accurate version of the surveillance footage from the underlying altercation between Plaintiff and Kevin Shaw, however Siek opted to ignore Plaintiff.

301. On September 6, 2024, Plaintiff successfully served subpoenas unto Jon Connolly, Cory Homer, Steven Siek, Eric Soroka, Santiago Vasquez, Alex Davies, Michael Wolanski, Herbert Yardley, Eric Wood, Michael Bucci and Rachel Bucci.

302. On September 16, 2024, Plaintiff's trial commenced.

303. On the same day, Acting Assistant Prosecutor Jerome P. Neidhardt presented the State of New Jersey's in-limine motion.

304. Plaintiff faced substantial prejudice in having his in-limine motions viewed by Superior Court Judge Michael C. Gaus.

305. Superior Court Judge Michael C. Gaus further barred Plaintiff from playing any body worn camera footage recording from the crime scene. This footage clearly showcased Steven Seik, Eric Soroka and Michael Wolanski engaging in a conspiracy to have Plaintiffs assault charges escalated.

306. Plaintiff was permitted to present in-limine motions 1, 5, 6, 7, 8 but not 2,3,4.

307. On September 17, 2024, Plaintiff resumed presenting in-limine motions 8, 9, 10, 11, 12, 13, 14.

308. Upon review of both sets of in-limine motions it was argued by Acting Assistant Prosecutor Jerome P. Neidhardt that Plaintiff's in-limine motions 'should be banned under the doctrines of Res Judicata & Collateral Estoppel.' However Superior Court Judge Michael C. Gaus correctly claimed that this claim did not apply to Plaintiff.

309. However, a substantial trial error was caught by Plaintiff when Superior Court Judge Michael C. Gaus began to rule on Acting Assistant Prosecutor Jerome P. Neidhardt's second in-limine motion.

310. Neidhardt's second in-limine motion was purportedly made to 'limit the scope of Plaintiff's relationship with the victim [Kevin Shaw] to just what was contained in the video.' However, Acting Assistant Prosecutor Jerome P. Neidhardt did not provide a copy of this motion to Plaintiff before the trial and Plaintiff had no awareness of this filing.

311. Plaintiff was outraged that Acting Assistant Prosecutor Jerome P. Neidhardt filed a secret in-limine motion to the court without informing him and brought it to the attention of Superior Court Judge Michael C. Gaus.

312. Acting Assistant Prosecutor Jerome P. Neidhardt confirmed on the trial record that he 'sent the motion to the wrong person and not to Plaintiff.'

313. Neidhardt further apologized to Plaintiff and promised to send him a copy when court ended.

314. Plaintiff requested that the trial be immediately cancelled as this motion was 'extremely prejudicial to his defense.'

315. Superior Court Judge Michael C. Gaus failed to listen to Plaintiff's concerns and requested that he review the motion in the evening and present a counter-argument tomorrow morning.

316. Plaintiff stated on the record that this decision was 'extremely unethical' and he had 'soccer coaching in the evening' and 'would not be able to present an effective defense.'

317. Court ended for the day of September 17, 2024.

318. The following evening Acting Assistant Prosecutor Jerome P. Neidhardt failed to send Plaintiff any copies of the second in-limine motion.

319. On September 18, 2024, Superior Court Judge Michael C. Gaus ruled on barring all 14 of Plaintiff's in-limine motions. This was done by approving Acting Assistant Prosecutor Jerome P. Neidhardt's secret second in-limine motion to 'limit Plaintiff's relationship with the victim [Kevin Shaw] to just what was contained in the video.'

320. Plaintiff could not believe that such a significant abuse of judicial power could happen in the United States of America.

321. The following afternoon, Plaintiff finally received a copy of Acting Assistant Prosecutor Jerome P. Neidhardt's second in-limine motion from Catherine Williams who was still operating as secretary to Michael C. Gaus.

322. The motion now signed and ruled upon, included additional language barring Plaintiff of making 'any mention of Sussex County Community College' and Plaintiff's motions were also suddenly and inexplicably barred under the 'doctrines of Res Judicata & Collateral Estoppel'; the same doctrine that Superior Court Judge Michael Gaus previously stated on the trial record that 'did not apply.'

323. As a result of this decision, Superior Court Judge Michael C. Gaus successfully barred any mention of Sussex County Community College wherein his wife, Janet C. Lucas was employed as Special Counsel Of Laddey Clark and Ryan, both prior and during Plaintiff's civil action against the college.

324. Superior Court Judge Michael C. Gaus, acting in concert with Defendant Jerome Neidhardt, improperly weaponized Plaintiff's prior civil settlement—procured ex parte by the Sussex County Community College Board of Trustees during a closed Executive Session and subsequently filed as "dismissed without costs" in the New Jersey Superior Court—by treating it as binding law under the doctrines of res judicata and collateral estoppel. Judge Gaus bizarrely applied the administrative settlement to bar Plaintiff from referencing any element relating to SCCC in his criminal proceeding, including precluding Plaintiff from mentioning SCCC, including its student-housing arrangement with Shaw, or the underlying civil disputes or context relevant to the criminal proceeding during his opening statement under the guise of doctrinal ambiguity. This action not only misapplied settled law regarding the scope of issue and claim preclusion in the criminal context, but also deprived Plaintiff of a meaningful opportunity to present a complete defense, thereby violating Plaintiff's rights to due process and a fair trial under the Sixth and Fourteenth Amendments. See *Nelson v. County of Allegheny*, 60 F.3d 1010, 1014 (3d Cir. 1995) ("Collateral estoppel is an equitable doctrine… not to be applied rigidly in criminal proceedings where fundamental rights are at stake."); see also *Haring v. Prosise*, 462 U.S. 306, 313 (1983) (explaining that "res judicata and collateral estoppel do not automatically extend from civil to criminal cases absent clear identity of issues and procedural safeguards"). The judicially sanctioned use of a civil settlement as a categorical bar to evidence or argument in a related criminal matter constitutes a profound and egregious departure from any first-world established jurisprudence, furthering Defendants' campaign to obstruct justice and chill the

exercise of protected rights.

325. Plaintiff's prepared opening statement, which was positioned openly on counsel table, was further improperly accessed and subsequently disclosed by Thomas Militano, serving as stand-by counsel. During one of several purported "restroom breaks," Militano transmitted the contents of Plaintiff's opening statement, among other critical defense strategies, to Assistant Prosecutor Jerome Neidhardt. This improper and unauthorized disclosure constituted a breach of the attorney-client relationship and directly undermined Plaintiff's strategic trial posture, affording the prosecution an unfair and prejudicial advantage in violation of Plaintiff's constitutional rights to due process and a fair trial. See *Weatherford v. Bursey*, 429 U.S. 545, 558 (1977) (recognizing that government intrusion into attorney-client communications implicates core Sixth Amendment protections).

326. Plaintiff was completely dejected and contemplated taking his own life during this time.

327. Jury voir dire began.

328. Plaintiff conducted voir dire under significant emotional distress and suffered a panic attack in the courtroom and the trial was paused.

329. Upon Plaintiff returning, Superior Court Judge Michael C. Gaus stated, upon reading out the charges against Plaintiff, that Plaintiff was being charged with a more severe form of assault by committing a 'severe bodily injury' [a second degree charge] rather than 'significant bodily injury' [a third degree charge].

330. A female member of the jury stated on the record that her 'heart dropped when she heard it was serious bodily injury.'

331. Court ended for the day of September 18, 2024

332. Plaintiff conducted voir dire through September 19, 2024.

333. Plaintiff continued to conduct voir dire through September 23, 2024.

334. Around this time, upon a juror answering in voir dire that 'his son went to college in the area', likely referring to SCCC, and Plaintiff's follow-up questioning to the juror for the exact college, Superior Court Judge Michael C. Gaus intervened stating 'he [Plaintiff] didn't need to know that information.'

335. Plaintiff continued to conduct voir dire through September 24, 2024 until a panel was confirmed at 11am.

336. After lunch break Acting Assistant Prosecutor Jerome P. Neidhardt gave a lengthy opening statement without any objection from Plaintiff.

337. However upon Plaintiff beginning his opening statement Acting Assistant Prosecutor Jerome P. Neidhardt objected three times and Plaintiff was called to side-bar with Superior Court Judge Michael C. Gaus.

338. Judge Michael C. Gaus informed Plaintiff that he had to comply with his new court order or he could 'be found in contempt' and 'arrested by the Sheriff.'

339. Plaintiff resumed his opening statement and was further objected and scolded by both Judge Michael C. Gaus and Acting Assistant Prosecutor Jerome P. Neidhardt.

340. Plaintiff, believing he was about to be incarcerated for speaking, finished his opening statement after 90 seconds.

341. Acting Assistant Prosecutor Jerome P. Neidhardt proposed numerous witnesses.

342. Plaintiff believed he would still be able to have an effective defense through his subpoenaed witnesses Jon Connolly, who had significant knowledge of the facts.

343. However, on the evening of September 24, 2024, Plaintiff received an anonymous voicemail on his cellphone. The audio purportedly from Jon Connolly stated 'let's just say Lee Coffey won't be getting out of Sussex County in one piece.'

344. Plaintiff believes a third party recorded this conversation with Connolly and sent it to Plaintiff as a warning to urgently leave Sussex County.

345. Plaintiff was unsure if the voice memo was pertaining to Plaintiff's eventual incarceration or a more sinister plot to have Plaintiff murdered.

346. Plaintiff also had significant concerns about Superior Court Judge Michael C. Gaus, especially given his conduct against Plaintiff in trial.

347. Plaintiff, fearing for his life, left the State of New Jersey on the evening of his trial.

348. Plaintiff informed standby counsel, Thomas Militano that 'due to unforeseen circumstances I am unable to proceed with the trial. I am hereby waiving my right to appear after 5 days of trial and 1.5 years of conferences.'

349. On September 25, 2024, Plaintiff informed Catherine Williams, Jerome Neidhardt, Carly Abrams and Thomas Militano that he [Plaintiff] had 'checked into a mental health facility.' Plaintiff also commented 'it is very apparent that justice is not blind.'

350. Plaintiff's closing comments to Thomas Militano were 'please finish the trial to the best of your ability and your fiduciary oath. As a Public Defender you made a promise to never reject the cause of the defenseless or oppressed, I trust you to deliver on this oath to the best of your abilities.'

351. On the same day, Superior Court Judge Michael C. Gaus suspended trial upon the arrival of the jury, and issued a bench warrant for Plaintiff.

352. On September 26, 2024, Plaintiff's trial resumed.

353. On September 27, 2024, Plaintiff was unanimously found guilty of third degree aggravated assault.

354. Superior Court Judge Michael C. Gaus rescinded a previous warrant and issued a new warrant for Plaintiff.

355. Media publications began to publish Plaintiff's conviction.

356. Plaintiff was informed that his sentencing was scheduled for November 8, 2024 and that he should return 'immediately' to avoid further penalties.

357. Plaintiff believes that Superior Court Judge Michael C. Gaus will sentence him to the statutory maximum of 5 years state prison even though Plaintiff has the presumption of non-incarceration.

358. On or about October 14, 2024, Sussex County Commissioner William Hayden, then acting in his official capacity as a member of the Sussex County Board of County Commissioners ("SCBCC"), issued a series of bizarre statements via his official government Facebook account "Sussex County Commissioner William Hayden."

https://www.facebook.com/hayden4sussex

359. Hayden's comments, constitutes a direct party-opponent admission under Federal Rule of Evidence 801(d)(2)(D), as it was made by an authorized agent of Defendant SCBCC concerning matters within the scope of his public duties, during the existence of that relationship. The contents of Hayden's statement are highly probative of the institutional misconduct at issue in this action and support Plaintiff's claims under 42 U.S.C. § 1983, the New Jersey Civil Rights Act (N.J.S.A. 10:6-2), and 18 U.S.C. § 1962 (civil RICO).

360. Commissioner Hayden, speaking in his capacity as an elected official, alleged widespread corruption, political retaliation, and financial mismanagement involving high-ranking members of SCBCC, including Commissioner Director Chris Carney and Deputy Director Jill Space.

361. Commissioner Bill Hayden, acting in his official governmental capacity, then made the following admission: "Sussex County, where money goes missing, and when you bring it up, you become the target."

362. This extreme statement, made on the public record by a sitting County Commissioner, constitutes a binding governmental admission, directly evidencing both (i) the existence of systemic financial improprieties within Sussex County government, and (ii) an entrenched, retaliatory culture wherein individuals who expose such improprieties—including Plaintiff—are deliberately targeted for adverse action by County officials.

363. Such an official acknowledgment by Commissioner Hayden is not only extraordinary but is detrimental to the credibility and brings light towards the inner functions of the Sussex County Board of County Commissioners and its Governance. Such comments bring significant color to Plaintiff's factual allegations.

364. Hayden, a sitting Governmental employee, in the performance of his public duties, corroborates Plaintiff's core allegations of institutional corruption, retaliatory animus, and the deprivation of rights under color of law. This admission is material to Monell liability and to Plaintiff's claims of conspiracy, as it demonstrates not only individual animus but a tacit or explicit County policy of targeting whistleblowers and dissenters, in violation of the First and Fourteenth Amendments. See *Praprotnik v. City of St. Louis*, 485 U.S. 112, 123 (1988) (municipal liability attaches where official policy-makers ratify or endorse unconstitutional conduct).

365. Commissioner Hayden further commented: "the incoming crew was hand selected and will be more puppets for the Space/Carney show" (referring to the incoming elected county-officials) and further declared that "Commissioner Carney still controls Mayor Silverthorne at Frankford Township… [creating] full time jobs for [friends] and all."

366. These statements constitute admissions of fact by a government agent and serve as direct evidence of a pattern of retaliatory governance, municipal patronage, and coordination of public appointments to protect institutional actors implicated in Plaintiff's allegations. Of particular significance is Commissioner Hayden, further elaborated on the record, more statements regarding the $500,000 discrepancy of the County records in relation to the Sussex County food pantry, which he investigated in connection with the donor's tax filings. Hayden explained that he "reviewed the amount of money declared as donated vs. the receipts of donated goods in the Spring of this year and they didn't match," and confirmed that an official investigation into the discrepancy was underway. Hayden's assertions further implicate Defendants Space and Carney in both potential fiscal misconduct and retaliatory retaliation against Hayden for attempting to expose irregularities. Hayden explicitly stated that Space and Carney publicly defamed him at meetings held in his absence, censured him without evidentiary

basis, and implemented retaliatory policies, such as a targeted dress code, as part of a larger campaign to eliminate him from office. These retaliatory actions mirror the type of coordinated pattern of institutional retaliation alleged by Plaintiff throughout this litigation.

367. On November 5, 2024, Superior Court Judge Michael C. Gaus temporarily closed Plaintiff's case but issued a nationwide bench warrant for Plaintiff's apprehension, de facto outcasting Plaintiff from society and keeping Plaintiff in a state of legal purgatory under a felony level embargo.

368. On November 15, 2024, Commissioner Jill Space hosted a political fundraiser for her upcoming Commissioner re-election bid for 2025 in conjunction with David Silverthorne of Frankford Township. The event, constituting as a dual political fundraiser for the Space / Silverthorne ticket, was marketed by the campaign as a GOP exclusive event, headlined by New Jersey State Representative Jack Ciattarelli and New Jersey State Senator Parker Space, the husband of Jill Space. Photographs directly from Jill Space's Government facebook account, authenticated and certified, reveal a shocking pattern of impropriety and institutional overlap, wherein SCCC President and Defendant Jon Connolly, a donor to Space's campaign, is seen conversing with New Jersey State Representative Jack Ciattarelli at the exclusive event. In the same image, SCCC Vice-Chair Elizabeth Silverthorne is seen in attendance with husband David Silverthorne, as is former SCBCC Deputy Commissioner Herbert Yardley. Douglas J. Steinhardt, the current SCBCC Counsel is also in attendance, in addition to SCBCC Director Chris Carney and SCBCC Commissioner Alan Henderson.

369. This visual record of overlapping political, institutional, and familial interests, captured not in abstract allegations, but in real-time photographic evidence directly from Defendant SCBCC's own publications. This illustrates far more than social proximity. It exposes a closed circuit of influence in which the very individuals entrusted with overseeing public

governance, fiscal integrity, and institutional accountability have become joint-participants in a mutually reinforcing system of concealment and complicity. In such a structurally entangled environment, the Sussex County Board of County Commissioners ("SCBCC") cannot plausibly disclaim knowledge or responsibility for the misconduct alleged, or investigate Jon Connolly's offenses, when that very same entity is heavily lobbying those very Government officials and rubbing shoulders with political heavyweights.

370. Sussex County Board of County Commissioners as the principal policymaking entity for Sussex County and a political subdivision of the State of New Jersey, bears an affirmative legal obligation to receive, process, and respond to constituent complaints, especially those implicating civil rights violations, misuse of public funds, or institutional retaliation.

371. Given the severe constitutional violations and excessive retaliation suffered by Plaintiff, he is unable to entrust any local State authorities in New Jersey with his care.

372. Plaintiff remains out of State for his safety and security.

373. On, or around November 16, 2024, Newton Police Chief Steven VanNieuwland stepped down from his role.

374. On November 20, 2024, Newton Police Department appointed Chief Joseph D'Annibale.

375. On January 6, 2025, Plaintiff in response to the new leadership of Joseph D'Annibale, filed a comprehensive 74 page complaint, supplied with audio recordings of Jon Connolly's threats made against Plaintiff. Audio included Connolly's new and undisclosed threats against Plaintiff made from February 2024. These comments by Connolly were brought forward on the record at both the Sussex County Board Of County Commissioner meeting minutes and at the Sussex County Community College Board of Trustee meetings. Plaintiff

also supplied D'Annibale with the September 24, 2024 voicemail where Connolly stated 'let's just say Lee Coffey won't be getting out of Sussex County in one piece.' Plaintiff complained that Jon Connolly should be charged with N.J.S.A 2C:12-3 - TERRORISTIC THREATS.

376. On the same day, Detective Sergeant Judy Torres informed Plaintiff 'Chief Joseph D'Annibale has personally assigned me to investigate this matter further. Please be assured that we will thoroughly review the situation and keep you informed with updates as the investigation progresses.'

377. On January 14, 2025, Governor Phil Murphy appointed James Santonastaso and Matthew Cable to the Sussex County Community College Board of Trustees.

378. On January 17, 2025, after an emergency Board of Trustees meeting, Jon Connolly announced his resignation as President of Sussex County Community College.

379. Also on the same day, Jon Connolly was granted tenure from the Board of Trustees and allowed to remain at the college as a professor.

380. On January 21, 2025, Plaintiff filed an additional complaint directly to the Newton Municipal Court administrator Katherine Quinn for Connolly's violations of N.J.S.A 2C:12-3 - TERRORISTIC THREATS.

381. On the same day, Detective Sergeant Judy Torres, informed Plaintiff the following: 'After reviewing your allegations and conducting an initial investigation, and after consulting with the Sussex County Prosecutors Office, we have determined that currently there is insufficient probable cause to proceed with criminal charges against Jon Connolly.'

382. On January 28, 2025, the Newton Municipal Court through Kathereine Quinn,

informed Plaintiff the following: 'Judge Carlucci thoroughly reviewed your submission, including the audio. He found no probable cause to issue any of these complaints.'

383. On the same day, Kathereine Quinn informed Plaintiff that 'Judge Carlucci has instructed me to send your [Plaintiff's] submission to the Prosecutor's office for further review.'

384. On January 30, 2025, President Donald J. Trump appointed Sussex County Counsel Douglas J. Steinhardt to Acting U.S Attorney General of the State of New Jersey.

385. Around this time, Sussex County Community College Board of Trustees Chair Kurt Gewecke resigned from his role.

386. On February 1, 2025, Acting Sussex County Prosecutor Carolyn Murray resigned from her role.

387. On February 2, 2025, acting Sussex County Community College Chairwoman Candice Smith resigned from her role.

388. On February 14, 2025, Plaintiff filed the following motions simultaneously in the Sussex Vicinage Criminal Superior Court in relation to his criminal case:

'Motion for Judicial Disqualification (Michael C. Gaus)'

'Motion for Judgment of Acquittal'

'Motion for a New Trial'

'Motion to Quash a Bench Warrant'

389. Plaintiff has expressed desire to bring his complaint forward against all named Defendants to the U.S. Department of Justice (DOJ) and the Federal Bureau of Investigation (FBI), inspired by the recent appointments of President Donald J. Trump.

390. On February 13, 2025, Plaintiff filed his original complaint in the United States District Court for the District of New Jersey, assigned as Case No. 2:25-cv-01264.

391. On the same day, the Sussex County Community College Board of Trustees, at the request of General Counsel Katherine A. Fina ("Katy Fina") of Florio Perrucci Steinhardt Cappelli & Tipton, LLC, held an emergency "Special Meeting" at the executive office board room.

392. As a result of the session, former Sussex County Board of County Commissioner Herbert Yardley was suddenly appointed Chair, in place of Acting Chairwoman Candice Smith, who was herself serving as a "temporary placeholder" following Kurt Gewecke's sudden and unexplained resignation.

393. Candice Smith, previously appointed as a Trustee on the SCCC Board during November, 2024, with a conditional four-year term, also unexpectedly "stepped down" from her role as Acting Chairwoman without any explanation. This abrupt departure underscores significant institutional turmoil and appears to have been intended by SCCC and SCBCC to obscure wrongful conduct associated with its former Chair Kurt Gewecke.

394. In the same session, Elizabeth Silverthorne, the wife of Commissioner Space's 2025 running mate, David Silverthorne, was appointed as SCCC Vice Chair.

395. Following the emergency appointments of Herbert Yardley as Chair and Elizabeth Silverthorne as Vice Chair of the Sussex County Community College Board of Trustees, the Sussex County Board of County Commissioners (SCBCC) exercised its de jure oversight authority to ratify and enforce such leadership changes. Given Yardley's status as a

long-term former County Commissioner and Silverthorne's direct political connection through her husband's candidacy aligned with Commissioner Space, the SCBCC's involvement reveals a calculated consolidation of influence within the SCCC's governance. This direct intervention by the SCBCC not only affirms its jurisdiction over trustee appointments but also signals the embedding of political interests within the College's leadership structure, raising substantial questions about the independence and integrity of institutional oversight during this critical transition.

396. On March 4, 2025, Plaintiff filed simultaneously in the Sussex Vicinage Criminal Superior Court the following motions in relation to his ongoing criminal prosecution: "Motion for Judicial Disqualification (Michael C. Gaus)," "Motion for Judgment of Acquittal," "Motion for a New Trial," and "Motion to Quash a Bench Warrant." These motions were aimed at challenging judicial impartiality, insufficiency of evidence, trial irregularities, and the legality of the outstanding bench warrant against Plaintiff.

397. On March 17, 2025, the United States Department of State suddenly and without warning, officially revoked Plaintiff's already limited F1 student visa, further jeopardizing Plaintiff's legal status and ability to return to the country amidst ongoing litigation and criminal prosecution.

398. On March 25, 2025, Jon Connolly, President of Sussex County Community College, and key component of this civil rights action, formally resigned from his position with a $193,700.64 compensation package.

399. This compensation package was ratified by newly appointed Chair and former Sussex County Commissioner, Herbert Yardley.

400. Around this time, all nine remaining signatories to the Sussex County Community College Board of Trustees' July 25, 2023 resolution—which authorized the

so-called “settlement” and “tuition refund” leveraged against Plaintiff during his criminal trial—resigned or otherwise departed from the institution. These signatories, including Acting Chair Candice Smith, David Castner, E. Jane Brown, Dr. Thomas Digby, Maryanne Fox, James Hofmann, John Santillo, and Chair Kurt Gewecke, have each either vacated their positions or departed from Sussex County Community College following replacements made by the Sussex County Board of County Commissioners.

401. Around March 27, 2025, Jon Connolly fled the State of New Jersey and returned to his home state of Maine, effectively evading ongoing legal and administrative scrutiny.

402. On March 28, 2025, Defendant Douglas Steinhardt, a key proponent of Plaintiff’s July 23, 2023 “settlement”, operating as de facto Counsel for Sussex County, communicated again to Plaintiff. This time Steinhardt revealed that there were purported “threats made by Plaintiff against Commissioner Jill Space and her family” and that such threats “were being reported to local and state law enforcement”. Steinhardt further stated, without factual basis, that Plaintiff also allegedly was “impersonating a federal law enforcement officer” and was “reported to federal authorities today”.

403. After Plaintiff responded with the statement, 'Blessed are those who are persecuted for righteousness’ sake, for theirs is the kingdom of heaven,' he further declared that Steinhardt’s threats, political connections, accusations, and posturing meant absolutely nothing to him, adding that Steinhardt could continue lobbying and escalating the matter to the Federal Government all he wished, but such efforts would not alter the underlying truth of the case.

404. Senator Douglas Steinhardt, the Presidential nominee for U.S Attorney General for the State of New Jersey, responded with 'lol', demonstrating an immature, bad

faith and contemptible response with the intent to ridicule Plaintiff.

405. On April 2, 2025, a new LinkedIn profile was created under Jon Connolly's name, listing his credentials, location, and claiming his new appointment as "Acting Dean of Science and Technical Studies" at Passaic County Community College.

406. Around this time, Sussex County Community College (SCCC), acting through its Board of Trustees and administrative officers, undertook to systematically remove, expunge, and conceal all metadata, electronic records, and public disclosures pertaining to the employment, separation, and settlement of former President and Defendant Jon Connolly. This included, but was not limited to, the deletion or redaction of digital footprints, website references, internal communications, and press releases that referenced Connolly's tenure and the circumstances of his departure. Such conduct constitutes a willful suppression and spoliation of potentially material evidence, executed in anticipation of or in direct response to ongoing litigation and public scrutiny. These actions were calculated to frustrate Plaintiff's ability to obtain relevant discovery, to obscure the true nature of SCCC's decision-making processes, and to shield Defendant Connolly and other implicated parties from accountability, thereby furthering the ongoing conspiracy to deprive Plaintiff of constitutional and statutory rights under federal law. See *Silvestri v. General Motors Corp.*, 271 F.3d 583, 590 (4th Cir. 2001) (spoliation includes "the destruction or material alteration of evidence or… the failure to preserve property for another's use as evidence in pending or reasonably foreseeable litigation").

407. On April 14, 2025, Superior Court Judge Michael C. Gaus denied Plaintiff's motions for judicial disqualification, judgment of acquittal, and to quash the bench warrant. Additionally, Plaintiff was denied any remote appearance accommodations after his exclusive request, severely limiting his ability to participate in the proceedings. Defendant

Thomas Militano was officially reassigned as Plaintiff's counsel on this date and Plaintiff was instructed to 'stop communicating with the Court'.

408. Soon thereafter, Defendant Thomas Militano, at Plaintiff's request, filed a motion for Plaintiff to be sentenced in absentia.

409. On April 29, 2025, Defendant Jerome Neidhardt, submitted to the motion.

410. On May 2, 2025, after a sudden rescheduling, Judge Gaus denied Plaintiff's requests for remote attendance and further denied Plaintiff's sentencing in absentia. Gaus cited "reasons placed on the trial record".

411. Between May 13 and June 2, 2025, Plaintiff made eleven written requests to Defendant Militano to file a motion for reconsideration of the sentencing rulings, providing detailed case law in support. Militano failed to act on these requests, effectively denying Plaintiff meaningful appellate or procedural relief.

412. On June 13, 2025, Sussex County Board of County Commissioners publicly disparaged Plaintiff on the trial record as a "conspiracy theorist" and characterized his allegations as "delusions," constituting a new pattern of defamatory retaliation.

413. Around this time, the Sussex County Board of County Commissioners (SCBCC) undertook a deliberate campaign to delete, conceal, and expunge all public-facing records, digital archives, and official references relating to the actions, membership, and proceedings of prior Boards of County Commissioners. This purge specifically included the systematic removal of records tying former Commissioner Herbert Yardley to the Board's authorization of the $193,700.64 payout to Defendant Jon Connolly. Such calculated destruction and suppression of government records was carried out in anticipation of litigation and public inquiry, and constitutes classic spoliation designed to frustrate Plaintiff's ability to obtain material evidence, to shield key decision-makers from scrutiny, and to

obstruct both judicial and public accountability. The SCBCC's actions further exemplify a pattern of concealment, institutional bad faith, and obstruction that materially impaired Plaintiff's access to relevant evidence and undermined the transparency of public governance, warranting adverse inferences and sanctions as recognized in federal and state law. See, e.g., *Bull v. United Parcel Serv., Inc*., 665 F.3d 68, 73 (3d Cir. 2012) ("Spoliation is the destruction or significant alteration of evidence, or the failure to preserve property for another's use as evidence in pending or reasonably foreseeable litigation."); *Mosaid Techs. Inc. v. Samsung Elecs*. Co., 348 F. Supp. 2d 332, 335 (D.N.J. 2004).

414. On June 18, 2025, the Sussex County Office of the Public Defender removed Thomas Militano as counsel in Plaintiff's criminal case at Plaintiff's voluminous requests.

415. Soon thereafter, the SCOPD, acting through its agent Daniel Palazzo, designated Gracia Montilus as Plaintiff's new attorney, despite Montilus lacking a valid bar license identification number and utilizing a public "gmail" email address for official correspondence.

416. On June 25, 2025, Sussex County Community College made a material misrepresentation to the Court by claiming that the settlement involving former President Connolly had been reached a year earlier (2024), constituting an attempt to mislead the Court in an attempt to chill the urgency of Plaintiff's emergency motion to depose Jon Connolly.

417. On July 14, 2025, the Sussex County Board of County Commissioners issued a subpoena to Google LLC, ostensibly seeking subscriber information and records related to Plaintiff's apparent email accounts, including freesussex@gmail.com and indivisiblesussex@gmail.com. However, in reality, this subpoena served as a pretextual and improper device for SCBCC to conduct Governmental surveillance, masked under procedural delay, to gather intelligence on local activists associated with groups such as

Indivisible Project Sussex County who have showcased private concern for Plaintiff's treatment by local Government officials.

418. Indivisible Project Sussex County, a nonprofit grassroots organization registered under 501(c)(4), is "dedicated to action through monthly meetings that organize peaceful advocacy efforts focused on protecting the planet, defending democracy, and strengthening local communities", and is "committed to cooperative efforts aimed at resisting the politics of hatred and division."

419. Many members of Indivisible Project Sussex County have been vociferous critics at the Sussex County Board of County Commissioners' bi-weekly public meetings, raising grave concerns about Defendant SCBCC's systematic assault on First Amendment rights. Their pointed scrutiny focuses especially on the Commissioners' recent practices, including the strategic issuance of exorbitantly priced permits for Newton Green—a historically vital and popular protest venue—explicitly timed to obstruct the June 14, 2025 "No Kings" protest. This tactic effectively weaponizes administrative hurdles to chill constitutionally protected speech and assembly.

420. Moreover, the Commissioners deliberately truncated public participation by repositioning the Executive Session early in the meeting agenda, preceding any public comment period. This maneuver suppresses robust public discourse, violating the spirit, if not the letter, of transparency laws and First Amendment protections. Compounding these constitutional affronts are serious allegations of election law violations documented by the New Jersey Election Law Enforcement Commission (NJELEC), revealing failures in upholding fundamental election integrity standards within the County GOP infrastructure.

421. The above practices collectively constitute a calculated and unlawful campaign by Sussex County officials to silence dissent, evade public accountability, and

undermine fundamental democratic norms. These facts are corroborated by ongoing investigative journalism, including reporting by Sussex County Watchdog, which documents over fifty local government scandals, exposing systemic corruption and abuses of power by the very officials sworn to serve the public interest. Such coordinated efforts to suppress protected speech, retaliate against whistleblowers, and conceal or destroy material evidence are actionable under 42 U.S.C. § 1983 and violate clearly established First Amendment and Due Process rights.

422. The Supreme Court has long recognized that retaliation against protected speech by public officials constitutes a core violation of the First Amendment. See *Mt. Healthy City Sch. Dist. Bd. of Educ. v. Doyle*, 429 U.S. 274 (1977). Moreover, conspiracies among government actors to deprive citizens of constitutional rights—particularly through coordinated cover-ups and suppression of dissent—are actionable and may be inferred from circumstantial evidence. See *Adickes v. S.H. Kress & Co*., 398 U.S. 144, 152 (1970). The concealment or spoliation of public records and evidence by governmental bodies, as well as calculated efforts to chill free expression, are antithetical to the principles of open government and trigger judicial remedies including sanctions, adverse inference, and heightened scrutiny. See *Brady v. Maryland*, 373 U.S. 83 (1963); *Bull v. United Parcel Serv., Inc*., 665 F.3d 68, 73 (3d Cir. 2012); *Garcetti v. Ceballos*, 547 U.S. 410, 417 (2006). Actions by public officials to shield their own misconduct from scrutiny run afoul of constitutional governance and give rise to liability under Section 1983.

423. On July 7, 2025, after public exposure and formal challenge, SCBCC partially withdrew the subpoena with respect to "indivisiblesussex@gmail.com," acknowledging its erroneous inclusion, but persisted in seeking records for "freesussex@gmail.com," thereby perpetuating the unjustified intrusion on Plaintiff's privacy and First Amendment rights.

424. On July 8, 2025, Plaintiff served a precise and lawful OPRA request upon the Sussex County Sheriff's Office and upon Chief Michael Strada, demanding full disclosure regarding the status, scope, and enforcement of a bench warrant issued by the Superior Court of New Jersey, Sussex Vicinage. Despite Plaintiff's clear entitlement to this information and his unequivocal intent to resolve outstanding legal obligations, the Sheriff's Office, acting through Undersheriff Matthew Avenatti, deliberately stonewalled and refused to provide any substantive response. Instead, the Office improperly deflected responsibility to the issuing court and invoked inapplicable legal doctrines to evade disclosure. This flagrant disregard for transparency constitutes a willful obstruction of justice and a continued pattern of retaliatory concealment by Sussex County authorities, thereby flagrantly violating Plaintiff's fundamental right to due process and willfully obstructing his lawful efforts to vindicate his civil rights through every available judicial and administrative forum, perpetuating ongoing harm and undermining the integrity of the legal system.

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[1] **Total Cost** = (Number of Students) × (Tuition per Student per Year), where:

Tuition per Student per Year = (Tuition per Credit) × (Total Credits per Year) + Fees

Substituting specific values:

- Tuition per Credit: $366 (based on current out-of-state tuition rates)
-
- Total Credits per Year: 30
- Fees per Year: $2,112

Calculation for each student:
Tuition per Student per Year = 366 × 30 + 2,112 = 10,980 + 2,112 = 12,012

For 20 students:
Total Cost = 20 × 12,012 = **240,240**

[2] **Total Rent Payments** = (Number of Students) × (Rent Payment per Student per Year), where:

Rent Payment per Student per Year = 5,500

Thus, for each student:
Rent Payment per Student per Year = 5,500

Total Rent Payments = 20 × 5,500 = **110,000**

[3] **Total Cost** = (Number of Students) × (Tuition per Student per Year), where:

Tuition per Student per Year = (Tuition per Credit) × (Total Credits per Year) + Fees

Substituting specific values:

- Tuition per Credit: $366 (based on current out-of-state tuition rates)
- Total Credits per Year: 30
- Fees per Year: $2,112

Calculation for each student:
Tuition per Student per Year = 366 × 30 + 2,112 = 10,980 + 2,112 = 12,012

For 27 students:
Total Cost = 27 × 12,012 = **324,324**

[4] **Total Rent Payments** = (Number of Students) × (Rent Payment per Student per Year), where:

Rent Payment per Student per Year = 5,500

Thus, for each student:
Rent Payment per Student per Year = 5,500

For 27 students:
Total Rent Payments = 27 × 5,500 = **148,500**

COUNT I

VIOLATION OF 42 U.S.C. § 1983

DEPRIVATION OF CONSTITUTIONAL RIGHTS UNDER COLOR OF STATE LAW

All individual defendants, both in their official and personal capacities.

425. Plaintiff re-alleges and incorporates by reference all preceding paragraphs as if fully set forth herein.

426. The First Amendment to the United States Constitution unequivocally guarantees Plaintiff the fundamental rights to freedom of speech, freedom of association, and the right to petition the government for a redress of grievances. These rights are cornerstones of our constitutional democracy and are protected against infringement by state actors through the Fourteenth Amendment's Due Process and Equal Protection Clauses.

427. Defendants, acting under color of state law and vested with official governmental or de jure Governmental authority, engaged in a deliberate, concerted, and ongoing pattern of unlawful retaliation, intimidation, and obstruction of justice specifically aimed at suppressing Plaintiff's exercise of these constitutionally protected rights. This includes orchestrating fabricated criminal charges, obstructing legal proceedings, and enforcing arbitrary, discriminatory policies calculated to silence Plaintiff's dissent and whistleblowing efforts.

428. Defendants' conduct squarely falls within the framework articulated by the Supreme Court in *United States v. Price*, 383 U.S. 787 (1966), which affirms that state officials acting under color of law who willfully cause deprivation of constitutional rights are liable under federal civil rights statutes.

429. The malicious acts committed by Defendants constitute a willful abuse of official power in violation of the Supreme Court's holding in *Screws v. United States*, 325 U.S. 91 (1945), which mandates liability for officers who, under color of law, intentionally deprive individuals of constitutional protections.

430. Plaintiff's constitutional rights were subjected to blatant viewpoint discrimination and unlawful retaliation, in direct contravention of well-established First Amendment jurisprudence, including *Mt. Healthy City School Dist. Bd. of Ed. v. Doyle*, 429 U.S. 274 (1977), and *Hartman v. Moore*, 547 U.S. 250 (2006).

431. Moreover, Defendants imposed prior restraints on Plaintiff's speech, erecting unconstitutional barriers to public expression and assembly, in clear violation of the Supreme Court's directives in Nebraska Press Ass'n v. Stuart, 427 U.S. 539 (1976), and Forsyth County v. Nationalist Movement, 505 U.S. 123 (1992).

432. The Defendants' retaliatory and discriminatory conduct was executed with malice, deliberate indifference, and reckless disregard for Plaintiff's constitutional rights, warranting the imposition of both compensatory and punitive damages to vindicate these rights and deter future violations, as recognized in *Smith v. Wade*, 461 U.S. 30 (1983).

433. Absent declaratory and injunctive relief enjoining the ongoing unconstitutional conduct of Defendants, Plaintiff will continue to suffer irreparable harm, including loss of reputation, impairment of personal and professional opportunities, and chilling of constitutionally protected expression and petitioning activities.

434. Plaintiff has no adequate remedy at law to redress these constitutional violations, thereby entitling him to all appropriate equitable relief.

COUNT II

VIOLATION OF 42 U.S.C. § 1983

MUNICIPAL LIABILITY (MONELL CLAIM)

Against: Sussex County Board of County Commissioners (SCBCC), Sussex County Community College (SCCC), and the Town of Newton.

435. Plaintiff re-alleges and incorporates by reference each and every preceding paragraph of this Complaint as though fully set forth herein.

436. Defendant Sussex County Board of County Commissioners ("SCBCC"), Sussex County Community College ("SCCC"), and the Town of Newton are municipal entities, political subdivisions and institutions of the State of New Jersey, and as such are subject to liability under 42 U.S.C. § 1983 for constitutional violations committed pursuant to official policy, custom, or practice, as established in *Monell v. Department of Social Services*, 436 U.S. 658 (1978).

437. Plaintiff's constitutional deprivations were caused by the deliberate actions, policies, customs, and practices of these municipal defendants, each acting through their duly authorized officers, agents, employees, and policymakers.

438. The municipal defendants knowingly maintained, implemented, and condoned a policy and custom of retaliation, suppression of protected speech, deliberate indifference to constitutional violations, and failure to supervise, discipline, and correct misconduct by individual officers and officials, thereby ratifying unlawful conduct and fostering a climate of impunity.

439. This deliberate indifference and tacit acquiescence to the status quo enabled and perpetuated a concerted campaign of harassment, retaliation, and constitutional deprivation against Plaintiff, including but not limited to fabricated criminal charges, obstruction of justice, and abusive investigative and prosecutorial practices that directly resulted in irreparable harm to

Plaintiff, beginning when Plaintiff was a 22-year-old non United States citizen.

440. The unconstitutional conduct is traceable directly to official policies and decisions, including resolutions passed by SCBCC and SCCC boards, public statements, and administrative directives, which demonstrate institutional approval and encouragement of retaliatory and suppressive actions targeting Plaintiff.

441. Furthermore, the Town of Newton's substitution as the municipal defendant for the Newton Police Department is appropriate to impose municipal liability under *Monell* principles, as the Town exercised final policymaking authority over police conduct and maintained customs or practices that caused or ratified the constitutional violations.

442. Plaintiff alleges that these municipal entities deliberately failed to establish, enforce, and maintain adequate training, supervision, and disciplinary procedures to prevent the unconstitutional conduct of their officers and employees, constituting reckless disregard and deliberate indifference under *City of Canton v. Harris*, 489 U.S. 378 (1989) resulting in irreparable harm to Plaintiff.

443. The policies, customs, and practices of these municipal defendants, marred by political acquiescence, favouritism and blackmail, constitute an affirmative link to the deprivation of Plaintiff's federally protected rights and were a moving force behind the unlawful acts and omissions complained of herein.

444. As a direct and proximate result of the defendants' policies and customs, Plaintiff has suffered severe harm, including violation of constitutional rights, reputational damage, emotional distress, and loss of liberty and opportunity.

445. Plaintiff seeks declaratory and injunctive relief to prohibit the continuation of

such unlawful municipal policies and practices, as well as compensatory and punitive damages to redress the injuries inflicted by these systemic failures and deliberate misconduct.

446. Plaintiff has no adequate remedy at law and will suffer continuing irreparable injury unless and until this Court grants appropriate equitable relief.

COUNT III

VIOLATION OF 42 U.S.C. §§ 1985(3) AND 1986

CONSPIRACY TO INTERFERE WITH CIVIL RIGHTS

Against All Individual and Institutional Defendants.

447. Plaintiff re-alleges and incorporates by reference each and every preceding paragraph of this Complaint as though fully set forth herein.

448. According to the most recent data available from the United States Census Bureau, the Town of Newton, New Jersey, has a population of approximately 8,374 residents. This demographic fact is relevant to contextualize the scope and scale of municipal governance and liability attributed to the Town in this litigation, as all Defendants share temporal proximity to local governance and possess de facto access to its institutions, locals, and communities within this exclusive jurisdiction.

449. 42 U.S.C. § 1985(3) prohibits conspiracies motivated by racial, or otherwise class-based, discriminatory animus, intended to deprive any person or class of persons of the equal protection of the laws or of equal privileges and immunities under the laws. Section 1986 imposes liability on any person who, having knowledge of a §1985 conspiracy, neglects or refuses to prevent its commission.

450. Defendants, acting in concert and pursuant to a mutual understanding, knowingly engaged in a conspiracy to unlawfully interfere with Plaintiff's federally protected civil rights, including but not limited to the rights secured by the First, Fourth, and Fourteenth Amendments to the United States Constitution.

451. This conspiracy manifested through coordinated efforts among prosecutorial officials, law enforcement agents, administrative actors, and institutional defendants, who collectively orchestrated fabricated charges, malicious investigations, evidence suppression, retaliatory prosecution, and administrative obstruction designed to silence Plaintiff's protected speech and whistleblower activity.

452. The Defendants' concerted scheme was motivated by animus against Plaintiff's exercise of constitutional rights and an intent to deprive him of equal protection and due process guaranteed under the law, satisfying the conspiratorial intent requirements of §1985(3), as recognized in *Griffin v. Breckenridge*, 403 U.S. 88 (1971), and *Farber v. City of Paterson*, 440 F.3d 131 (3d Cir. 2006).

453. Each conspirator had actual knowledge of the wrongful conspiracy and knowingly or recklessly acquiesced in the violations, thereby rendering themselves liable under 42 U.S.C. § 1986.

454. The conspiracy caused direct and proximate injury to Plaintiff, including but not limited to violation of constitutional rights, deprivation of liberty, damage to reputation, emotional distress, and financial harm.

455. The Defendants' actions constitute egregious abuses of power and betray the public trust vested in them as state actors, warranting the imposition of punitive damages to

deter such conspiratorial misconduct.

456. Absent declaratory and injunctive relief restraining Defendants and their agents from continuing such conspiratorial violations, Plaintiff will suffer ongoing irreparable harm.

457. Plaintiff has no adequate remedy at law for these violations and is entitled to all appropriate relief, including compensatory and punitive damages, injunctive relief, attorneys' fees, and costs.

COUNT IV

VIOLATION OF 42 U.S.C. § 1983

MALICIOUS ABUSE OF PROCESS

Against: Douglas Steinhardt, Jerome Neidhardt, Thomas Militano, Jon Connolly, Steven Van Nieuwland, Steven Siek, Eric Soroka, Judy Torres, and agents who weaponized the criminal process for improper purposes.

458. Plaintiff re-alleges and incorporates by reference each and every preceding paragraph of this Complaint as though fully set forth herein.

459. Defendants, acting under color of state law and vested with governmental authority, engaged in a malicious and deliberate misuse of the criminal justice process for an improper purpose — namely, to intimidate, harass, and retaliate against Plaintiff for exercising constitutionally protected rights.

460. This conduct constitutes an abuse of process under federal civil rights law, wherein the legal system was weaponized as a tool of oppression rather than justice, in violation

of Plaintiff's First, Fourth, and Fourteenth Amendment rights.

461. The malicious abuse of process includes the initiation and continuation of criminal proceedings with no probable cause or legitimate evidentiary basis, the fabrication and suppression of evidence, and the manipulation of prosecutorial and investigatory powers to inflict reputational, professional, and personal harm upon Plaintiff.

462. Such actions are deliberate and reckless, undertaken with actual malice and an intent to cause unjustifiable harm, and were conducted despite knowledge that the criminal proceedings were baseless or pretextual.

463. Plaintiff invokes the New Jersey Supreme Court's seminal ruling in *LoBiondo v. Schwartz*, 199 N.J. 62 (2009), which clearly distinguishes abuse of process from malicious prosecution and affirms a cause of action for deliberate misuse of legal process for an ulterior motive, alongside the Third Circuit's recognition of a federal § 1983 abuse of process claim in *Jennings v. Shuman*, 567 F.2d 1213 (3d Cir. 1977).

464. Defendants' actions were willful, wanton, and in reckless disregard of Plaintiff's constitutional rights, warranting the imposition of compensatory and punitive damages to deter similar misconduct and vindicate the rule of law.

465. Absent immediate declaratory and injunctive relief preventing the continuation or repetition of these abuses, Plaintiff will continue to endure irreparable injury, including ongoing deprivation of liberty and constitutional protections.

466. Plaintiff has no adequate remedy at law, entitling him to all appropriate equitable relief, including declaratory judgment, injunctive relief, and damages.

COUNT V

VIOLATION OF 18 U.S.C. §§ 1961–1968

CIVIL RACKETEER INFLUENCED AND CORRUPT ORGANIZATIONS ACT (RICO) CLAIMS

Against Individual Defendants Constituting an Association-in-Fact Enterprise Including Douglas Steinhardt (SCBCC Counsel), Jerome Neidhardt (Assistant Prosecutor), Thomas Militano (Public Defender), Jon Connolly (SCCC President), Steven Van Nieuwland (Newton Police Chief), Steven Siek, Eric Soroka, Judy Torres (law enforcement agents), Sussex County Board of County Commissioners (institutional defendant), and Sussex County Community College (institutional defendant)

467. Plaintiff hereby re-alleges and incorporates by reference each and every preceding paragraph of this Complaint as though fully set forth herein.

468. The Racketeer Influenced and Corrupt Organizations Act ("RICO"), 18 U.S.C. §§ 1961–1968, provides a federal remedy against persons who conduct or participate, directly or indirectly, in the conduct of an enterprise's affairs through a pattern of racketeering activity. Congress enacted RICO to combat organized, ongoing criminal conduct that threatens the very fabric of civil society and lawful governance.

469. Defendants, acting individually and collectively as an association-in-fact enterprise, engaged in a coordinated and continuous pattern of racketeering activity, comprising predicate acts of extortion, obstruction of justice, fraud, and abuse of official power, all designed to consolidate and perpetuate their corrupt dominion over local government institutions and to systematically discriminate against vulnerable international students—often recruited as minors from overseas—thereby exacerbating their exploitation

and marginalization.

470. The enterprise, encompassing Sussex County Board of County Commissioners, Sussex County Community College officials, and co-conspirators, operated with a common purpose to manipulate federal, legal and administrative processes to scout, recruit and secure international students from abroad. However, upon Plaintiff's queries into the ethical and legality of such institutional practices, wherein he was a participant, Defendants sought to intimidate and unlawfully harm Plaintiff through a multi-layered network of organized crime under the guise of local institutions.

471. Defendants' racketeering acts were neither isolated nor random but constitute a "pattern" as defined under 18 U.S.C. § 1961(5), reflecting repeated and related misconduct over a substantial period of time, demonstrating the enterprise's ongoing criminal scheme.

472. Plaintiff's injuries are proximately caused by Defendants' violations of RICO statutes, as the conspiratorial conduct directly resulted in concrete and measurable damages to Plaintiff's business, livelihood, and personal well-being.

473. The Defendants' conduct is egregious, malicious, and undertaken with reckless disregard for Plaintiff's rights and the rule of law, warranting treble damages under 18 U.S.C. § 1964(c) to deter future criminal conduct and to provide full restitution for Plaintiff's substantial losses.

474. Plaintiff has no adequate remedy at law to address these violations, thereby entitling him to all appropriate injunctive relief, declaratory relief, and damages as prescribed under RICO.

COUNT VI

INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS (IIED)

STATE LAW CLAIM

Against All Individual Defendants in Their Official and Personal Capacities

475. Plaintiff hereby re-alleges and incorporates by reference each and every preceding paragraph of this Complaint as though fully set forth herein.

476. Defendants, through their deliberate, egregious, and reprehensible conduct, engaged in a concerted pattern of extreme and outrageous behavior, intentionally and recklessly inflicting severe emotional distress upon Plaintiff. This conduct includes, but is not limited to, the fabrication of criminal charges, malicious prosecution, targeted harassment, retaliatory actions, and systematic efforts to defame and destroy Plaintiff's personal and professional reputation.

477. Such conduct was beyond all possible bounds of decency tolerated in a civilized society and was undertaken with the express purpose of causing Plaintiff severe psychological harm, humiliation, and anguish. The New Jersey Supreme Court in *Buckley v. Trenton Saving Fund Soc'y*, 111 N.J. 355, 545 A.2d 857 (1988), established the threshold for IIED claims, requiring conduct to be "so outrageous in character, and so extreme in degree, as to go beyond all possible bounds of decency."

478. Defendants' actions constitute an intentional and malicious abuse of power, executed with the deliberate aim of inflicting mental suffering and emotional trauma. This is consistent with *Tymczyszyn v. Health Professionals*, 183 N.J. 109, 870 A.2d 852 (2005), which held that IIED claims require proof that the defendant's conduct was intended to cause, or recklessly disregarded the likelihood of causing, severe emotional distress.

479. As a direct and proximate result of Defendants' outrageous conduct, Plaintiff has suffered severe emotional distress, including but not limited to anxiety, depression, humiliation, loss of sleep, and impairment of daily functioning, all of which have significantly and detrimentally affected Plaintiff's quality of life.

480. Defendants' conduct was willful, wanton, and malicious, justifying the imposition of punitive damages to deter such egregious misconduct, in accord with *Nicholas v. Mynster*, 213 N.J. 463, 73 A.3d 9 (2013).

481. Plaintiff has no adequate remedy at law, and therefore seeks compensatory and punitive damages, along with any other relief the Court deems just and proper.

482. As part of their racketeering scheme, Defendants engaged in coordinated efforts to falsify records, fabricate charges, and obstruct justice to further their enterprise's illicit financial and institutional interests. This conduct aligns with the elements of a civil RICO violation as outlined in *Interchange State Bank v. Veglia*, 286 N.J. Super. 164 (App. Div. 1995).

COUNT VII

VIOLATION OF THE NEW JERSEY CIVIL RIGHTS ACT (NJCRA),

N.J.S.A. 10:6-2 ET SEQ.

Against All Individual Defendants, in Their Official and Personal Capacities

483. Plaintiff hereby re-alleges and incorporates by reference each and every preceding paragraph of this Complaint as though fully set forth herein.

484. The New Jersey Civil Rights Act ("NJCRA"), codified at N.J.S.A. 10:6-2 et seq., was enacted to protect individuals from the deprivation of rights, privileges, or

immunities secured by the Constitution or laws of the United States or the State of New Jersey. The NJCRA expressly provides a private cause of action for any person who has been deprived of such rights by a person acting under color of law. See *Tumpson v. Farina*, 218 N.J. 450, 474 (2014).

485. The NJCRA is interpreted analogously to its federal counterpart, 42 U.S.C. § 1983. As such, all violations asserted in Count I of this Complaint under the U.S. Constitution and § 1983 are equally actionable under the NJCRA. See *Perez v. Zagami, LLC*, 218 N.J. 202, 215 (2014); *Gormley v. Wood-El*, 218 N.J. 72, 97–98 (2014).

486. Defendants, while acting under color of state law and within the scope of their authority, willfully and maliciously deprived Plaintiff of clearly established constitutional rights, including, but not limited to, the rights to freedom of speech, freedom of association, due process of law, and equal protection under the law, as secured by Article I of the New Jersey Constitution. This includes engaging in acts of retaliation, suppression of speech, fabrication of charges, obstruction of legal redress, and abuse of institutional power.

487. The conduct of Defendants constitutes repeated and targeted violations of Plaintiff's rights under the NJCRA, and reflects a deliberate pattern of discrimination, intimidation, and retaliation that has caused Plaintiff severe and ongoing harm.

488. Pursuant to *Owens v. Feigin*, 194 N.J. 607, 613 (2008), and *Brown v. State*, 442 N.J. Super. 406, 426 (App. Div. 2015), Plaintiff seeks all available remedies under the NJCRA, including compensatory damages, punitive damages, equitable relief, and reasonable attorneys' fees and costs (if applicable), as authorized by N.J.S.A. 10:6-2(f).

489. Absent injunctive and declaratory relief, Defendants' ongoing pattern of

unlawful conduct will continue to irreparably harm Plaintiff's constitutional rights, chill protected activities, and endanger public trust in government institutions.

490. Plaintiff has no adequate remedy at law to redress these violations and is entitled to all appropriate relief available under the NJCRA.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that this Honorable Court enter judgment in his favor and against the Defendants, jointly and severally, and grant the following relief:

DECLATORY RELIEF

A formal declaration that the Defendants' actions, policies, customs, and practices, as described herein, seriously violated Plaintiff's rights under the First, Fourth, and Fourteenth Amendments of the United States Constitution, as well as the New Jersey Civil Rights Act (N.J.S.A. 10:6-1 et seq.) and other applicable federal and state laws.

INJUNCTIVE RELIEF

A. A permanent injunction prohibiting Defendants, their agents, employees, officers, successors, attorneys, and all persons acting in concert or participation with them, from engaging in any acts of harassment, retaliation, surveillance, intimidation, defamation, or discrimination against Plaintiff or Plaintiff's minor child.

B. An order directing Sussex County Community College to implement safeguards to protect international students from exploitation, retaliation, and unlawful housing

arrangements.

C. An order requiring Newton Police Department to establish a comprehensive oversight and compliance program to prevent future constitutional and statutory violations.

COMPENSATORY AND SPECIAL DAMAGES

D. An award of compensatory damages in the amount of **$7,500,000** for Plaintiff's severe pain and suffering, mental and emotional distress, reputational injury, loss of educational and professional opportunities, and the enduring psychological trauma resulting from Defendants' unconstitutional and tortious actions directly resulting in the administrative injunction and resulting estrangement of Plaintiff from his U.S citizen child. This revised figure is consistent with awards granted in comparable malicious prosecution, abuse of process, and First Amendment retaliation cases across the federal judiciary where systemic official misconduct caused life-altering harm (e.g., *Greisen v. Hanken*, $4.1M, *Dennis v. City of Philadelphia*, $10M compensatory; *Halsey v. Pfeiffer*, $12.5M global settlement).

E. An award of special damages in the amount of **$500,000** for economic losses sustained, including forced relocation, international displacement, tuition costs, lost wages, housing costs, and other financial burdens directly resulting from Defendants' unlawful acts. This special damages component is supported by patterns of awards in malicious prosecution and false arrest cases involving loss of liberty, livelihood, and educational access (*Walker v. Erie County*, $28M, *Brown v. Chicago*, $50M with $10M+ attributed to economic hardship).

PUNITIVE DAMAGES

F. An award of punitive damages in the amount of **$6,000,000** against Defendants in their individual capacities, whose conduct was willful, wanton, malicious, and carried out with reckless or callous indifference to Plaintiff's federally protected rights. Under *Smith v.*

Wade, 461 U.S. 30 (1983), punitive damages are appropriate where state actors engage in egregious violations of constitutional norms, particularly involving intentional misuse of prosecutorial, police, or institutional power.

TREBLE DAMAGES UNDER RICO (18 U.S.C. § 1964(C))

G. For claims under the Civil RICO statute (Count V), Plaintiff seeks treble damages pursuant to 18 U.S.C. § 1964(c), which mandates that any person injured in business or property by reason of a RICO violation "shall recover threefold the damages he sustains." In light of predicate acts including extortion, fraud, obstruction of justice, and abuse of power by a cohesive enterprise of public actors, Plaintiff reserves the right to seek treble damages of up to **$9,000,000**, contingent upon the jury's determination of actual damages under this claim.

SUCH OTHER RELIEF AS THIS COURT DEEMS JUST AND PROPER

H. Any further relief that the Court deems just, equitable, and appropriate in the interest of justice pursuant to 42 U.S.C. § 1988, 28 U.S.C. § 1920, and other applicable laws.

CERTIFICATION OF COMPLIANCE WITH LOCAL RULES

491. Pursuant to Local Civil Rule 11.2, the undersigned certifies that, to the best of their knowledge, the matter in controversy is not the subject of any other pending action in any court, administrative proceeding, or arbitration.

492. Plaintiff previously filed two related actions in the Special Civil Part of the Sussex Vicinage Superior Court of New Jersey against Sussex County Community College (SCCC):

493. The first action was dismissed without prejudice on June 23, 2023 due to

Plaintiff's failure to answer excessive interrogatories that Plaintiff claimed breached the rules of civility. This dismissal did not involve an adjudication on the merits and does not preclude the claims asserted in the present action.

494. The second civil action was filed by Plaintiff in the Superior Court of New Jersey, Sussex Vicinage, and was administratively filed as "settled without costs" on the docket by SCCC's previous Counsel Stephen J. Edelstein. However, as documented in the official minutes of the Sussex County Community College Board of Trustees, the Board convened on July 25, 2023 and unilaterally approved—without judicial supervision or adversarial hearing—an ex parte disbursement of $18,893 to Plaintiff as a purported "tuition refund," with an ex-parte "website transfer clause" provision, thereby memorializing a financial resolution and contract outside of formal court approval or Plaintiff's knowledge. This clause was further weaponized against Plaintiff in both his indictment, pre-trial diversion denial and was eventually deployed in Plaintiff's criminal trial to bar defensive testimony, evidentiary exhibits and foundation.

495. While Plaintiff acknowledges receipt of this payment, he affirmatively asserts that the present federal claims arise not from the initial Special Civil Part action, but from a continuing course of unlawful, retaliatory, and constitutionally violative conduct that occurred subsequent to—and in some instances as a direct reprisal for—Plaintiff's exercise of protected rights in the prior litigation. The current action therefore encompasses new harms, newly discovered facts, and post-settlement retaliatory acts that were not contemplated, resolved, or discharged by the July 25, 2023 resolution, and thus are not barred by doctrines of res judicata, accord and satisfaction or the Entire Controversy Doctrine ("ECD").

496. Plaintiff also previously filed an action in the Special Civil Part against Defendant

Shaw, which was resolved through a stipulation of settlement on May 26, 2023. However, Plaintiff's current claims against Shaw are based on new and distinct events, including a conspiracy to harm Plaintiff and ongoing post-settlement retaliatory conduct as is demonstrated in this complaint.

497. Because the constitutional violations, threats, and conspiracy alleged in this Complaint arose after the prior settlements, Plaintiff respectfully submits that the present claims are properly before this Court.

498. If additional related actions are discovered, Plaintiff will promptly notify the Court in accordance with Local Civil Rule 11.2.

DEMAND FOR PRESERVATION OF EVIDENCE

Plaintiff hereby places all Defendants, their agents, attorneys, employees, and affiliated entities on formal notice that they are under a legal duty to preserve all evidence relevant to this action, including but not limited to:

499. Electronically Stored Information (ESI) such as emails, internal memoranda, and other digital communications.

500. Security footage from Sussex County Community College, the Newton Police Department and the Sussex County Board of County Commissioner building located on 1 Spring St, Newton, NJ, 07860.

501. Body-worn camera recordings from law enforcement officers involved in Plaintiff's allegations.

502. Records of disciplinary actions, complaints, and internal investigations related to

the claims asserted herein.

503. Call logs, text messages, social media communications, and financial records related to Plaintiff's allegations.

504. Prohibiting any further modifications to Plaintiff's MCCS records without a formal court order.

505. Failure to preserve such evidence may result in adverse inferences, spoliation sanctions, or other remedies as deemed appropriate by this Court.

506. Plaintiff expressly reserves the right to seek expedited discovery and a Court-ordered preservation directive should there be any indication that Defendants have destroyed or intend to destroy material evidence.

JURY DEMAND

507. Pursuant to Federal Rule of Civil Procedure 38(b), Plaintiff hereby demands a trial by jury on all issues so triable.

Respectfully submitted,

Dated: July 14, 2025

/s/ Lee Coffey

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